

Brighton & Hove Submission City Plan Part One

Proposed Modifications

July 2014

Sequential and Exception Tests for the Brighton & Hove City Plan Update 2014



**Brighton & Hove
City Council**

Sequential and Exception Tests for the Brighton & Hove City Plan

Part 1: Introduction

The National Planning Policy Framework requires Local Plans to “apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by applying the Sequential Test, and, if necessary, applying the Exception Test”¹. This paper sets out how this requirement has been applied to the City Plan Part One. It is structured as follows:

- Part 1: Introduction;
- Part 2 summarises the proposed levels of development within each of the specific locations where development is proposed the City Plan Part One, and provides a summary of the risks from flooding affecting Brighton & Hove;
- Part 3 sets out the Sequential Test for each location²;
- Part 4 sets out the Exception Test for particular proposed uses on sites that are located in Flood Zones 2 and 3a.

This paper was originally prepared in May 2008 and updated in October 2009 and April 2012. This further update in June 2014 takes into account proposed modifications to the City Plan following the initial hearing sessions of the Examination.

Development in Flood Risk Zones

Government guidance in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) does not aim to prevent all development on sites liable to flooding, accepting that some form of development may have to be located there. The focus is instead to minimise risks to people and property by seeking to direct development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The risk of sea and river flooding of an area is categorised according to the probability of flooding occurring in any given year. The categories are summarised in Table 1³:

Flood zone	Risk of Flooding
1	Low probability - less than 1 in 1000 annual probability of river or
2	Medium probability - between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200

¹ National Planning Policy Framework, para. 100

² Separate sequential tests will be prepared for land uses identified through the Site Allocations DPD, and for any masterplans that are prepared as part of the Local Development Framework.

³ For further information refer to Technical Guidance to the National Planning Policy Framework, Table 1.

3a	High probability - a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of
3b	Functional floodplain - land where water has to flow or be stored

Table 1 – Summary of Flood Risk Zones

Table 2 shows which type of development can be appropriately located in each flood zone, and where the Exception Test is required⁴. Appendix 1 lists the types of development that are classified under each flood risk vulnerability classification.

Flood risk vulnerability classification		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood Zone	Zone 1					
	Zone 2			Exception Test required		
	Zone 3a	Exception Test required		x	Exception Test required	
	Zone 3b	Exception Test required		x	x	x

Table 2 – Flood risk vulnerability and flood zone 'compatibility'

Key:

Development is appropriate

X Development should not be permitted

Source: *Technical Guidance to the National Planning Policy Framework*

The overall aim should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, the flood risk vulnerability of land uses should be taken into account and reasonably available sites in Flood Zone 2 considered, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

⁴ See part 3 of this document for further information on the Exception Test.

Part 2 – Context

Flood risk in Brighton & Hove

There are no rivers within Brighton & Hove and therefore no fluvial flood risk, however aquifers in the chalk downland mean that emergent groundwater presents a significant risk of flooding to some areas.

The City shares approximately 14km of its boundary with the sea so there is also a risk of coastal flooding along some sections of the seafront, although much of the area at risk from tidal flooding is protected by flood defences.

In addition to these sources of flood risk, surface water run off from existing and new development can contribute to flood risk.

A more detailed explanation of the risks from flooding in the city is contained within Section 4 of the SFRA, and maps showing the locations of each of the DAs together with spatial flood risk data is contained within Appendix A of that document.

City Plan Spatial Strategy

The Council's overarching spatial strategy for the city to 2030 is to direct future development to eight broad areas of the city where identified capacity exists to accommodate significant levels of development. These areas are identified in the emerging City Plan, part of the Brighton & Hove Local Development Framework, as 'Development Areas' (DAs). In addition there is a strategic allocation at the King Alfred site in Hove through Policy SA1.

The DAs are proposed to accommodate a significant amount of development because they contain opportunities for change, they can deliver development of city-wide or regional importance and/or because they are in need of regeneration. The eight DAs are:

- DA1 - Brighton Centre and Churchill Square Area;
- DA2 - Brighton Marina, Gas Works, and Black Rock Area;
- DA3 - Lewes Road Area;
- DA4 - New England Quarter and London Road Area;
- DA5 - Eastern Road and Edward Street Area;
- DA6 - Hove Station Area;
- DA7 - Toad's Hole Valley;
- DA8 - Shoreham Harbour Area;

The urban fringe is now identified as a broad area of opportunity with an allowance of 1,200 home⁵s. This provision would come forward on a variety of

⁵ The 1,200 home urban fringe allowance is in addition to the housing provision on Toads Hole Valley.

sites and no specific locations are allocated. Therefore the Sequential Test cannot be applied to this allowance.

Flood Risk Vulnerability of the City Plan Allocations

The Development Areas and King Alfred are the only spatially specific locations identified in the City Plan Part 1. The following table sets out these nine locations, the existing land uses, proposed uses, the flood risk vulnerability classification for the proposed uses, and any existing flood defences at the location.

Table 1 – analysis of flood risk vulnerability of the proposed Development Areas identified in the City Plan

Policy no.	Development Area	Flood risk zone(s)	Existing flood defences	Existing uses	Proposed Development	Flood vulnerability classification⁷
DA1	Brighton Centre and Churchill Square Area	FZ1	n/a	Retail Leisure Hotels Offices Church Residential	Minimum of 20,000 m ² retail 25,000 m ² leisure 20 residential units	Less vulnerable Less vulnerable
DA2	Brighton Marina, Gas Works, and Black Rock Area	FZ1 FZ2 FZ3a	Currently defended to 1 in 200 (0.5%) annual probability level ⁸ .	Retail Leisure Residential Hotel Employment	2000 m ² industrial 5000 m ² retail 10,500 m ² leisure and recreation 1,940 residential units Community building A health facility within or in the vicinity of the Marina A primary school or increase in the number of school places within or in the vicinity of the Marina	Less vulnerable Less vulnerable Less vulnerable More vulnerable (or highly vulnerable if basements) More vulnerable/less vulnerable (depending on details) More vulnerable More vulnerable
DA3	Lewes Road Area	FZ1	n/a	Residential Retail Education Employment	810 residential units Community Building 15,600 m ² employment floorspace including an Innovation Centre; Business School and additional academic floorspace (16,000 m ²);	More vulnerable (or high vulnerable if basements) Less vulnerable Less vulnerable More vulnerable

⁶ Flood Risk Zones are identified in the Brighton & Hove Strategic Flood Risk Assessment, which is informed by Environment Agency Flood Maps

⁷ See 'Technical Guidance to the National Planning Policy Framework', Table 1

⁸ See SFRA, Appendix B.

DA4	New England Quarter and London Road Area	FZ1	n/a	Residential Retail Hotel Employment Leisure Education	1,185 residential units 300 student housing 20,000 m ² B1 floorspace	More vulnerable (or highly vulnerable if basements) More vulnerable (or highly vulnerable if basements) Less vulnerable
DA5	Eastern Road Edward Street Area	FZ1	n/a	Residential Retail Health Employment Leisure Community	470 residential units; 18,200 - 23,200 m ² employment floorspace; 74,000 m ² hospital floorspace; 400-bed student accommodation 3,800 m ² education floorspace Dance studio, multi-practice GP and community building 3530 m ² University library (education floorspace); a community building for Queens Park and Craven Vale. Ancillary supporting uses	More vulnerable (or highly vulnerable if basements) Less vulnerable More vulnerable More vulnerable (or highly vulnerable if basements) More vulnerable Less vulnerable More vulnerable Less vulnerable Less vulnerable
DA6	Hove Station Area	FZ1	n/a	Residential Retail Employment	Within Conway Street Industrial Area retention/ replacement of 12,000 sq m employment floorspace 1,000 m ² employment additional 630 residential units	Less vulnerable More vulnerable (or highly vulnerable if basements)

DA7	Toad's Hole Valley	FZ1	n/a	Open space	<p>Minimum of 700 residential units</p> <p>Minimum of 25,000 m² of office space</p> <p>Primary School</p> <p>Eco-centre</p> <p>Public open space with children's play space and informal sports facilities</p> <p>Shops and cafes</p> <p>Doctor's surgery</p> <p>Food growing space</p>	<p>More vulnerable(or highly vulnerable if basements)</p> <p>Less vulnerable</p> <p>More vulnerable</p> <p>Less vulnerable</p> <p>Water compatible development</p> <p>Less vulnerable</p> <p>Less vulnerable</p> <p>Water compatible development</p>
DA8	Shoreham Harbour Area	FZ1 FZ2 FZ3a	<p>South Portslade – n/a</p> <p>Shoreham Harbour - estimated defence of 1 in 50 year standard⁹</p>	<p>Port</p> <p>Employment</p> <p>Residential</p> <p>Retail</p> <p>Education</p> <p>Community</p>	<p>300¹⁰ residential units within Brighton & Hove</p> <p>7500 m² net additional employment floorspace</p>	<p>More vulnerable(or highly vulnerable if basements)</p> <p>Less vulnerable</p>

¹⁰ Through the proposed modifications to the City Plan the housing allocation at Shoreham Harbour has been reduced from 400 to 300 homes

SA1	The Seafront – King Alfred	FZ1	n/a	Sport & Recreation	Replacement leisure facility Minimum 400 homes	Less vulnerable More vulnerable(or highly vulnerable if basements)
------------	-----------------------------------	-----	-----	--------------------	---	---

Part 3 – The Sequential Test

New development should be directed first to sites at the lowest probability of flooding with the flood vulnerability of the intended use matched to the flood risk of the site i.e. higher vulnerability uses should be located on parts of the site at lowest probability of flooding. The Sequential Test aims to ensure this occurs by considering whether development proposed for Flood Zones 2 and 3 could be located in zones less susceptible to flooding.

Which Flood Zones are the proposed site allocations in?

Allocations wholly within Flood Zone 1:

- DA1 Brighton Centre and Churchill Square Area
- DA3 Lewes Road Area
- DA4 New England Quarter and London Road Area
- DA5 Eastern Road and Edward Street Area
- DA6 Hove Station Area
- DA7 Toad's Hole Valley
- SA1: The Seafront (King Alfred Strategic Allocation)

Allocations partly in Flood Zone 1:

- DA2 Brighton Marina, Gas Works, and Black Rock Area (8% of the area)
- DA8 Shoreham Harbour Area (66% of the area)

Allocations partly in Flood Zone 2:

- DA2 Brighton Marina, Gas Works, and Black Rock Area (2% of the area)
- DA8 Shoreham Harbour Area (9% of the area)

Allocations wholly or partly in Flood Zone 3a:

- DA2 Brighton Marina, Gas Works, and Black Rock Area (80% of the area)¹¹
- DA8 Shoreham Harbour Area (25% of the area)

Allocations in Flood Zone 3b: none

For the allocations wholly within Flood Zone 1, the location is appropriate in flood risk terms for all development and there is no need to proceed with the Sequential Test.

Are the proposed uses in the 'water compatible' or 'less vulnerable' flood risk vulnerability classification?

The development proposed for the allocations falls into the following vulnerability classifications:

Water compatible:

- amenity open space/public realm improvements

¹¹ Percentages for Brighton Marina in the SFRA do not add up to 100%

Less vulnerable:

- retail
- restaurants/cafes
- offices
- indoor leisure facility

More vulnerable:

- residential
- student housing
- health services (Brighton Marina).

Highly vulnerable: none

Can the Development Areas in Flood Zones 2 and 3a be redirected to other locations in Flood Zone 1?

Alternative strategic locations for development were considered at the following locations situated in Flood Zone 1:

Portland Road - following consultation comments and further assessment whilst opportunities were identified for townscape improvements and improvements to the local shopping centre there was not sufficient capacity to accommodate significant development to warrant its inclusion as a specific Development Area. The proposed Sustainable Neighbourhoods Proposals and general Core Policies were considered sufficient policy guidance for future development in this area.

Old Shoreham Road corridor - following consultation comments and further assessment, it is considered that whilst there is the potential for improvements relating to the sustainable transport corridor and north-south links in the Hove area along the corridor, the majority of sites along Old Shoreham Road have been identified within the Employment Land Study as requiring safeguarding for employment uses and therefore do not present significant development opportunity. However links to Old Shoreham Road have been made in the Hove Station Area as they relate to that area and in the Shoreham Harbour and South Portslade area.

Western Seafront (Kingsway and Wellington Road) - following further investigation of opportunities for additional development beyond existing commitments it was felt that this area did not present significant development potential and opportunities regarding townscape improvements and improved links to the seafront could be better dealt with in a revised Seafront Policy SA1.

The Urban Fringe - Consultation responses at the early stages of the plan preparation suggested a lack of consensus as to the role of the urban fringe. The protection and enhancement of the wider landscape role of land within the urban fringe is considered necessary to protect the setting of the South Downs National Park and the strategic views into and out of the city. The urban fringe is also promoted as part of the city's green network and to encouraging opportunities for recreation and cultural experiences, new allotments and local

food production and biodiversity conservation and enhancements.

The Submission City Plan Part One (through the spatial strategy) indicated that although future development should be accommodated primarily within the existing built up area of the city, one location on the urban fringe, at Toads Hole Valley, was included as a Development Area to assist in meeting the development and infrastructure needs of the city.

The City Plan Inspector indicated in her closing statement at the public hearings in October 2013 that further work and modifications would be required before the Plan could be found. This was detailed in an Initial Conclusions Letter sent by the Inspector 13 December 2013.

The letter made clear the Inspector considered the city's objectively assessed housing need should be at the higher end of the objectively assessed range i.e. 20,000 over the plan period¹² and that due to the significant shortfall the City Council should look again to rigorously assess all opportunities to meet housing need, including the urban fringe.

Consultants were commissioned by the council to undertake a robust assessment of the potential for housing within the urban fringe. The Urban Fringe Assessment Study has informed the proposed modifications to the spatial strategy for accommodating growth in the city and CP1 Housing Delivery. It is proposed that the Urban Fringe is now identified as a broad source of housing potential with the capacity to accommodate approximately 1,150 units. However, despite this, the City Plan remains significantly short of providing for the full objectively assessed need for housing. Housing on the urban fringe is therefore in addition to that proposed for the Development Areas in Flood Zones 2 and 3a rather than a means of relocating the provision.

Relying on windfall sites to deliver the proposed levels of housing.

The Submission City Plan made an allowance for small windfall in the later stages in the plan period. The Inspector in her Initial Conclusions Letter indicated that the council should investigate this further as an opportunity to increase the target for the provision of new housing. Through the 2014 Strategic Housing Land Availability Assessment (SHLAA) an additional windfall allowance of 650 units has also been added to the city's housing target which is proposed to be increased to 13,200 which remains significantly short of the full objectively assessed need of 20,000.

However monitoring of small windfall sites suggests that these sites would not be able to accommodate the full scale of development proposed and would lead to a shortfall against the City Plan targets. To rely that significantly on windfall sites would also have implications for the developer contributions and investment that could be secured, especially in terms of large items of infrastructure that are vital to the city.

Could the proposed development in Flood Zones 2 and 3 be alternatively located in the allocations in Flood Zone 1?

¹² Housing Duty to Cooperate Study, Sussex Coast Housing Market Area, May 2013

It was also considered whether the proposed development could be alternatively located in Flood Zone 1 by relocating it to other Development Areas. Means of achieving this are considered below:

- **Intensifying development at another DA**

Studies so far indicate that none of the identified Development Areas have capacity to accommodate that scale of development in addition to what is already proposed in the City Plan.

- **Dividing up the proposed development between the other DAs**

If the amount of residential development was significantly increased at the other Development Areas then it would be at the cost of other land uses that are allocated in the City Plan for that area. This varies according to the Development Area, but potentially it could conflict with necessary land use allocations for tourism, retail, employment, education/community facilities, open space or regeneration objectives. This could risk delivering unbalanced and unsustainable communities in those Development Areas.

Dividing up the development could also threaten the developer contributions received towards significant items of infrastructure such as a rapid/express bus-based service.

None of these options are therefore considered practical.

Can the Development Areas in Flood Zone 3a be redirected to Flood Zones 2?

The SFRA illustrates that apart from a thin coastal strip, Flood Zone 2 is overlain by Flood Zone 3 in Brighton & Hove, therefore there are no sites in Zone 2 where development could be reasonably be redirected to. Furthermore, development is specifically required in these DAs to aid regeneration and redevelopment objectives. In these situations development cannot go elsewhere as there are no reasonably available sites.

The approach for these areas is therefore to maximise opportunities to reduce flood risk to the community, for example by locating the higher vulnerability class uses in the areas of lowest flood risk. Opportunities may exist to build in sustainable drainage elements. The Sequential approach must also still be applied *within* the regeneration area, and in larger areas a sequential test may also be applied within the area.

The three parts of the Exception Test also need to be passed (see Part 4 below).

Can the more flood sensitive development use types be directed to parts of the site where the risks are lower for both the occupiers and the premises themselves?

Planning policies and guidance, based on the SFRA, will where possible direct the more vulnerable uses away from the sources of flooding and closer to the

lower risk parts of Flood Zone 3. The most sensitive uses on each sites should be guided to the areas of relatively lower flood risk through more detailed discussion at the planning application stage.

In all cases it must be demonstrated that an adequate standard of safety can be achieved through a site specific Flood Risk Assessment and will comply with Environment Agency requirements and the Exceptions Test if applicable.

Part 4 – The Exception Test

Table 2 (above) details when the Exception Test must be carried out. For the two DAs partly within Zones 2 and 3a (Shoreham Harbour and Brighton Marina), the Test is required for highly vulnerable land uses in Zone 2 and essential infrastructure and more vulnerable land uses in Zone 3a.

As set out in the NPPF, the Test comprises two parts, both of which must be passed for development to be allocated or permitted. These are considered below:

1. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared

The Sustainability Appraisal (SA) of the City Plan has considered how well the proposed allocations will contribute to the twenty-two identified sustainability objectives. The SA findings indicate that the strategic allocations at Brighton Marina and Shoreham Harbour would both have a broadly positive impact on these objectives. The findings are reproduced in detail in Appendix 2.

2. A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

A site specific Flood Risk Assessment (FRA) must be carried out in the event of detailed proposals being submitted. National guidance states that it is the responsibility of the developer to prepare a comprehensive flood risk management strategy for the site appropriate to the scale of the development to ensure the site is safe¹³.

The SFRA for the city includes a Level 2 SFRA for all Development Areas which examines in detail various aspects of risk such as depth, rate of onset, and residual risks to people and property.

Therefore any development proposal must take into account all of the risks and suggested mitigation and management measures identified in Appendix B of the SFRA which sets out the minimum requirements to ensure safe development, and also the recommendations of any site-specific FRA that is

¹³ NPPG paragraph 31.

prepared at the time of the application.

A site-specific FRA must be carried out in order to demonstrate that the development of a site will not increase flood risk on the site or elsewhere, and that where possible it will reduce flood risk. Appendix 3 contains suggested requirements for FRAs, as set out in the SFRA.

Appendix C of the SFRA contains further recommendations for mitigation measures that could be incorporated into new developments.

Conclusion

All the proposed Development Area allocations have passed the Sequential Test.

The Exception Test has also been applied to DA2 (Brighton Marina) and DA8 (Shoreham Harbour) and it is considered that the wider sustainability benefits of development at both locations outweigh the flood risks. Site specific FRAs produced to support proposals will ensure that development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere. It is therefore considered appropriate to allocate both sites in the Brighton & Hove City Plan.

Appendices

Appendix 1 – Flood risk Vulnerability Classification

Essential infrastructure

- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.
- Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.
- Wind turbines.

Highly vulnerable

- Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.
- Emergency dispersal points.
- Basement dwellings.
- Caravans, mobile homes and park homes intended for permanent residential use.
- Installations requiring hazardous substances consent. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”)

More vulnerable

- Hospitals.
- Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill and sites used for waste management facilities for hazardous waste.
- Sites used for holiday or short-let caravans and camping, *subject to a specific warning and evacuation plan.*

Less vulnerable

- Police, ambulance and fire stations which are *not* required to be operational during flooding.
- Buildings used for shops, financial, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in “more vulnerable”, and assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do *not* need to remain operational during times of flood.
- Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).

Water-compatible development

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, *subject to a specific warning and evacuation plan.*

Appendix 2 – Sustainability Appraisal of the proposed Development Areas located in Flood Zone

3

DA2 Brighton Marina, Gas Works and Black Rock

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The Marina itself has a severe lack of green open space and biodiversity therefore development could increase the amount of biodiversity in the Marina itself, e.g. through features that enhance or encourage biodiversity. However the site is adjacent to an SSSI and three SNCIs, some of which contain habitats of International Conservation Importance (coastal vegetated shingle). There is also much maritime biodiversity that has colonised the marina environment which is now dependant on the unique micro-habitat. In addition, the National Park boundary comes to the cliffs to the east of the Marina and development has potential to have a direct or indirect negative impact on any of these designated sites. The Marina is also now surrounded by a Marine Conservation Zone.</p> <p>However, the SA notes that the policy makes specific references to protecting the ecological environment, enhancing the biodiversity, geodiversity and having regard to the designated sites located within or adjacent to the Marina, as well as implementing an ecological masterplan, and these requirements should ensure the protection of these key sites, as well as biodiversity in general. In addition, the policy makes a specific requirement to create links between green spaces. Therefore a -/+ score is awarded to reflect the potential risks of development in this area but the positive aspirations of the policy. In addition to the requirements of the policy, CP10 should also ensure that negative impacts are avoided.</p>	-/+	-/+	-/+
2) Improve air quality	<p>DA2 is currently situated outside the declared AQMA. The DA is currently served by public transport, however access for pedestrians and cyclists is poor. There are a number of measures contained within the policy that should help to improve access and connectivity to the wider area and thereby have a positive impact on local air quality including: improvements to public realm, enhancement of transport infrastructure, enhanced bus service and improved pedestrian/cyclist access.</p> <p>However, the policy includes a variety of different types of developments, with a significant number of housing units, all of which are likely to put increased pressure on transport infrastructure available and may result in an increase in people travelling by car, either for visiting the Marina for leisure/work purposes or as residents, or an increase in journeys made by other forms of transport, e.g. for delivering goods and so on. The amount of</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	housing to be delivered could significantly increase local car ownership, which may worsen air quality in and around the area, unless a significant amount of car free housing is delivered, and is likely to result in sensitive receptors being located by the roadside.			
3) Maintain local distinctiveness and sites	<p>Built environment: The Marina area itself does not have a coherent urban form and the areas of public realm have resulted from piecemeal, haphazard development over time. There are few buildings to note within the area, however the Kemp Town Conservation Area, which contains numerous listed buildings, lies to the north west of the Marina and therefore any development must have due regard and not detract from this status. The policy is likely to lead to improvements to local distinctiveness within the Marina area itself, through creation of a sustainable mixed use area of the city containing high quality building design, whilst preserving and emphasising the traditional Marina uses. The policy no longer has a restriction on building height in relation to the cliff future development proposals may come forward with tall buildings. This may impact upon the settings of or views from the adjacent Conservation Area and listed buildings. Tall buildings adjacent to the cliff may also impact upon strategic views along the seafront, particularly of the cliffs east of the Marina when viewed from the west. The impact is therefore considered to be uncertain and will depend on the specific design of any proposed scheme. See mitigation.</p> <p>Open space: The policy specifies that open space must be provided in accordance with other city plan policies. It is presumed that this will be balanced with competing uses, however the SA considers it unlikely that the full open space needs of the future population will be able to be met on site. Open space is currently lacking on site, however the SA recognises that the site is adjacent to and within walking distance from most typologies of open space although is on the outer boundary of provision for children and young people, and is not within reasonable distance to provision of allotments, however actual access to these sites from within the Marina area is poor. The presumed inability to provide additional open space on site, is reflected in the negative aspect of the score.</p>	-/?	-/?	-/?
4) Protect South Downs	The Marina area is situated adjacent to the SDNP boundary. The policy no longer specifies that development should not breach cliff height. Development that goes above cliff height could have adverse impacts on the setting, or of views from or of the SDNP and will depend on the specific design of any proposed scheme. The policy is therefore considered to have uncertain impacts on this objective. See mitigation.	?	?	?
5) Provide decent, affordable housing	The policy should provide 1940 residential units, some of which will be affordable in accordance with CP20 and will therefore have a significantly positive impact on this objective.	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
6) Reduce amount of car journeys	<p>The Marina is currently served by public transport, however access for pedestrians and cyclists is poor. In addition, there is currently a large free car park that encourages people to drive to the Marina for leisure or other purposes. The policy includes a variety of different types of developments, with a significant number of housing units, all of which are likely to put increased pressure on transport available and may result in an increase in people travelling by car, either for visiting the Marina for leisure/work purposes or as residents, potentially adding to existing congestion. In addition, access is limited to the Marina via the vehicular ramps which dominate the Marina environment.</p> <p>There are a number of measures contained within the policy that should help to improve access and connectivity to the wider area and thereby have a positive impact on reducing the number of journeys made by car including: improvements to public realm, enhanced bus service, enhanced transport infrastructure and improved pedestrian/cyclist access. In addition, the policy now also states that proposals should maximise opportunities to reduce car ownership. However, despite the positive aspirations of the policy, the SA considers that congestion and car ownership and travel to accommodate the needs of other uses located within or around the marina will increase as a result of the policy.</p> <p>The cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures.</p>	-	-	--
7) Minimise risk of pollution to water	<p>The SFRA 2012 identified the entire site to be at risk of surface water flooding in the 1 in 200 year event and the area currently dominated by the existing supermarket car park to be at risk in the 1 in 30 year event. Therefore development in this location would need to be planned in order to reduce the consequence of flood risk and to ensure that flood risk is not increased elsewhere.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>	-	-	-
8) Minimise use of water	<p>Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>The requirements of CP8 should ensure that water consumption is minimised.</p>	-	-	-
9) Promote development of contaminated land	<p>The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	application stage. In addition, the Gas Works site has potential for significant contamination, and part of the site has already been remediated and the policy now contains a new requirement to show that potential new uses would be compatible with possible land contamination.			
10) Manage coastal defences	<p>The SFRA 2008 and 2012 indicates that Brighton Marina is situated within floodzone 3a (high probability of flooding) and therefore the impact on this objective is considered to be negative. The SFRA also found the area to be at increased risk of flooding due to climate change, due to reduction in the standard of protection provided by the inner harbour walls over time.</p> <p>All development proposals would need to carry out a site specific flood risk assessment and any development proposals for more vulnerable uses would need to pass the sequential and exception tests. The SA notes that the policy requires developments to be in accordance with the Shoreline Management Plan and incorporate site specific flood risk assessments in line with recommendations set out in the SFRA.</p> <p>There is the risk that any construction works could destabilise the cliffs, however the policy requires development proposals to accord with the relevant Shoreline Management Plan which should avoid any negative impact on the sea defences and cliff stability.</p>	-	-	--
11) Employment: balance needs of tourists, residents and businesses	<p>The policy is likely to have a significant positive impact on this objective in the medium to long term, through provision of a range of development uses. The policy should lead to 5,000sqm retail floorspace situated in the Inner Harbour area, 2,000sqm of industrial employment floorspace (B1 and B2) at the Gas Works area, and 10,500sqm of leisure floorspace at the Black Rock area and the Gas Works area, as well as other uses. The SA notes that the amount of industrial to be delivered has reduced based on findings of the Employment Land Study and that the amount set out in the policy is considered to be achievable given the site constraints.</p> <p>The delivery of this amount of varying uses will meet the needs of residents and tourists alike and provide opportunities for employment on site, both during construction and operation stage. There is also a requirement that some of the B1 and B2 floorspace includes a range of sizes of units, including small and start-up units, which will help to meet the needs of a variety of industries. The leisure facilities at the Black Rock site will further benefit existing shops, restaurants and others located within the Marina, with potential for increased footfall. Employment created in this location could be of particular benefit locally, and the SA welcomes the new requirement for all strategic allocations to provide training for local people, which could help reduce employment based deprivation. The SA notes that the reduction in industrial floorspace will need to be met elsewhere in the city, to ensure the city's overall needs for this type of floorspace is not compromised.</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	The SA notes the amendments to the policy relating to the removal of the District Centre status. Although this may impact on the mix of uses located within the area, this is not considered to result in any adverse impacts against this objective when set within the wider context of the policy.			
12) Support economic development	As with objective 11, the policy should be positive for a number of sectors, particularly, retail and independent retailers through helping to improve the performance of the area, benefiting existing shops and services, as well as providing need for additional uses as outlined above. In addition it will provide leisure and recreation facilities that attracts visitors and residents to the area, having wider economic benefits for the area. The policy also seeks to protect the existing marina related uses, benefiting the leisure and hospitality sectors and also aims to provide for varying employment needs through delivery of office and industrial, including start up units. All of these anticipated outcomes will have positive impacts and support economic development. Again, as stated under objective 11, the reduction in the amount of industrial employment floorspace delivered will need to be met elsewhere in the city, to ensure economic growth in this sector is not compromised. The SA notes the amendments to the policy relating to the removal of the District Centre status. Its removal from the retail hierarchy will mean that the sequential test for out of town shopping proposals would no longer take into consideration the Marina as a town centre location risking out of town retail developments in the east of the city. An impact assessment for larger proposals would also not be required to look at the impact of the proposal on the Marina. The removal of the district centre status may also result in a lack of uses that are more familiar with a district centre from being delivered, such as banks, post offices etc. This will become more significant in the long-term with the delivery of more housing when the need for a balanced variety of uses to meet day to day needs of residents becomes more acute. The policy seeks to address this by specifying that a detailed policy regarding the appropriate type and mix of A1 and non A1 uses for the Marina will be set out in Part 2. On balance, the policy is still considered to have positive impacts for economic development, leading to significantly positive impacts in the long term.	+	++	++
13) Improve health	Overall, there should be positive implications for health resulting from delivery of this policy. This is due to the provision of housing and employment, both of which are wider determinants of health as well as the range of services that would usually be located in a district centre. In addition, the provision of a new health facility either within or in the vicinity of the Marina will also have benefits in terms of access to health facilities, and a new community facility will have benefits in terms of access to social activities and community	+	+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	cohesion. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being. In accordance with CP18, a Health Impact Assessment of the strategic development would need to take place in order to ascertain impact on existing communities. However it is acknowledged that any increase in traffic could have negative impacts on health in the long term, due to reduced air quality, increased noise and road safety.			
14) Integrate health and community safety	Although improving community safety is not a key priority, the policy is likely to result in measures that prevent anti-social behaviour, through design of buildings that offer natural passive surveillance and a mixed-use community. Improvements to access for pedestrians and cyclists, as well as improvements to permeability should also lead to improvements in road safety.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>The Marina is situated within the Rottingdean Coastal ward, although is situated in closer proximity to the adjacent East Brighton ward, which lies to the north of the Marina. The East Brighton ward has significant levels of deprivation, with some LSOAs situated within the ward having the highest levels of deprivation in the city in some domains, including income and education & skills.</p> <p>The policy is likely to have a positive impact on narrowing the gap and reducing inequalities through a variety of infrastructure that will be delivered or improved through implementation of the policy, e.g. community building, GPs practice, and additional school places. All of these will be needed to meet the needs of the predicted increase in population resulting from increased housing in the area as well as meeting existing needs. In addition, employment created in this location could be of particular benefit locally, with several local super output areas located in East Brighton area suffering from high levels of employment and income deprivation, and the new requirement for developers to provide training for local people should further enhance opportunities.</p>	+	+	+
16) Engage local communities	The policy will allow for engagement of the local community through consultation on strategic developments coming forward.	+	+	+
17) Make the best of previously developed land	The Development Area is all previously developed land therefore the policy should have a positive impact on this objective. The policy makes a specific reference to optimising development on PDL through delivery of high density mixed development.	+	+	+
18) Maximise sustainable energy	<p>Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies.</p> <p>The policy has a specific reference to maximising opportunities for large-scale zero and low-carbon energy technologies to serve the Marina and wider city reflecting the positive</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>score. However the main modification that allows viability and deliverability to be considered as grounds on which this requirement is not delivered brings about a certain degree of uncertainty. The policy does also encourage developers to consider heat network infrastructure, which would also have positive implications for this objective.</p> <p>The government targets for all new homes to be zero carbon by 2016 and all new non residential development to be zero carbon by 2019, should also ensure the impact is mainly positive. In addition, CP8 sets various requirements.</p>			
19) Taking account of the changing climate	<p>The potential impacts of climate change include an increase in extreme weather events, e.g. droughts, storms and heavy rainfall, as well as predicted rises in sea level which will increase the likelihood of tidal flooding. The SFRA 2012 outlines areas which will be at risk of tidal flooding as a result of the effects of climate change and this includes areas situated on the developed area of the Marina. Development in this area is therefore considered to be at greater risk of the impacts of climate change, particularly coastal flooding with climate change reducing the effectiveness of the existing sea defences over time.</p> <p>New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, likely to be more prevalent in the exposed location of the Marina. CP8 requires all development to be able to respond to changing needs and CP11 ensures coastal defences are protected.</p>	-	-	--
20) Meet BREEAM / Code for Sustainable Homes	<p>Although the proposals will be expected to meet the building standards set out in CP8, there is no specific requirement within the policy, and therefore the impact on this objective is considered to be negative.</p> <p>CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.</p>	-	-	-
21) Increasing accessibility	<p>The policy should have a positive impact on this objective. Improvements to access to the area should occur, including pedestrian and cycle access, as well as improvements to public transport. In addition, the policy will also result in a variety of developments and infrastructure, including healthcare provision, a community building, housing and employment opportunities, thereby increasing provision for local people to access local services. The removal of the district centre status may result in a lack of uses that are more familiar with a district centre from being delivered, such as banks, post offices etc. This will become more significant in the long-term with the delivery of more housing when the need for a balanced variety of uses to meet day to day needs of residents becomes</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	more acute. The policy seeks to address this by specifying that a detailed policy regarding the appropriate type and mix of A1 and non A1 uses for the Marina will be set out in Part 2. On balance, the policy overall is still considered to have positive impacts for accessibility, leading to significantly positive impacts in the long term.			
22) Reduction of waste	Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy DA8: Shoreham Harbour

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Within the Brighton & Hove area, the Basin Road South SNCI and habitats and species associated with this may be sensitive to impacts potentially arising as a result of any scheme. The wider JAAP area is regionally important for passage birds, of county importance for wintering birds and locally important for breeding birds.</p> <p>No ecological study has been carried out to determine the impacts of this scheme, and would be recommended as part of a wider Environmental Impact Assessment, particularly of land reclamation from within the Canal area if required.</p> <p>Development may provide the opportunity to enhance biodiversity, however also presents a risk as outlined above and therefore a negative uncertain impact for the medium and long term is awarded.</p>		-?	-?
2) Improve air quality	<p>Some of the development area falls within the AQMA that was designated in 2013. NO₂ levels have been modelled along certain roads in Brighton & Hove and the area that runs along the A259 carriageway between Church Road and Wharf Road exceeds the annual mean air quality objective for NO₂. Within this area, NO₂ levels at the Boundary Road/Station Road junction and the Wharf Road junction are considered likely to continue to exceed the annual mean limit value for NO₂ in future years. Pollution levels at the Wharf Road junction can be partly attributable to the volume of HGVs that use this junction to access Wharf Road, however the width of the carriageway and streetscape in this area are better for dispersion of vehicle emissions. Poor air quality is more of an issue for sensitive receptors at the Boundary Road/A259 junction and also for those situated alongside Church Road/Trafalgar Road where the carriageway is narrower and the streetscape creates a canyon effect.</p> <p>One of the priorities for Character Area 3: North Quayside/South Portslade is to develop a new access road to the South Quayside via the existing junction at Church Road/A259/Basin Road North and linking to the existing Basin Road North. This would also link to Basin Road South and would divert HGVs from the route currently used via the Wharf Road junction. This is likely to reduce the level of exceedence and improve the existing air quality around the Wharf Road/A259 junction. The SA recommends that monitoring of air quality at the three key junctions along the A259 in this area would help to ascertain the impact on air quality.</p> <p>The policy proposes certain amounts of development, including 400 residential units within</p>		-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>the Brighton & Hove area of the Harbour, and 7,500sqm of additional employment floorspace, some of which may be used by non-port employment uses and the overall aim of the policy is to enhance the operations of the Port. This additional amount of development in the area is likely to have some impacts on number of journeys made to the area and congestion, with potential for associated impacts on air quality either within the development area or on key roads within the surrounding area.</p> <p>It is presumed that the detailed JAAP policy will set out the aims in terms of sustainable transport, which may help to mitigate against this and the SA recommends that the detailed JAAP policy should seek to ensure that sensitive receptors are located away from the roadside and that any new streetscapes are designed to avoid the canyon effect.</p> <p>A negative score is awarded as although the changes to access to the port may bring about localised improvements in air quality, overall the impact is considered to be negative. The SA notes that the recommendation put forward at draft City Plan stage (May 2012) to include a reference to improving air quality for Character Area 3 – North Quayside/South Portslade has been included.</p>			
3) Maintain local distinctiveness	<p>Poorly designed or located development can have a negative impact on the historical built environment with the wider area containing a Scheduled Ancient Monument, listed buildings and is adjacent to conservation areas, all of which will need to be considered. Some of the existing townscape and public realm in the area is of poor quality and priorities for Character Areas 2 and 3 includes improving the local townscape which should lead to a positive impact on this objective.</p> <p>The policy proposes 400 residential units which will generate demand for open space. It is not known whether the full open space requirements of future residents could be met on site and this could increase the pressure on existing areas of open space situated within the western wards of Brighton & Hove, such as Vale Park, Victoria Park, Wish Park and Hove Lagoon which are all within close proximity to this part of the Development Area. The Area Priorities for character area 5 include the improvement of the quality and access of public areas, including the beaches, which are an important component of open space in this area and should also help to bring about positive impacts against this objective. The SA recommends that reference to protection of the historic built environment and provision of open space should be made, although recognises that this may be more appropriately located in the more detailed JAAP policy.</p>		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
4) Protect South Downs	<p>The Shoreham Harbour and Boundary Road area were both identified as areas with potential for tall buildings in the Tall Building Study (2003). Although the location of tall buildings in this location is unlikely to impact on views of the Downs, they may impact on views from the Downs, which are an important part of the National Park designation. It is unknown what height buildings may be in the area, however the AECOM Shoreham Harbour Capacity and Viability Study (2011) indicates that buildings may be up to 6 storeys in height. The SA does not consider that buildings of this height would significantly impact on views from the Downs, however the SA recommends that the impact should be tested at application stage and considers the impacts to be uncertain.</p>		?	?
5) Provide decent, affordable housing	<p>The policy specifies delivery of 300 residential units in the Brighton & Hove part of the Development Area which is less than previous iterations of the policy. The area is a broad location for housing, however the Area Priorities for Character Areas 2 (Aldrington Basin) and 3 (North Quayside/South Portslade) include residential/mixed use development in these areas, although there is no indication as to how this will be delivered and it is expected that this will be considered further by the JAAP. The impact is likely to be positive on this objective, with this becoming more significant in the long term.</p>		+	++
6) Reduce amount of car journeys	<p>There are strong east-west links throughout the area provided by the existing railway and road network, although the road network suffers from congestion. Links north-south are more constrained. Previous transport assessments have shown that there is limited capacity for the existing road network to absorb additional journeys in the area. Vehicular access to the port is heavily constrained as is restricted to a single access point. The Harbour area is a popular route for cyclists with National Cycle Route 2 passing through the Harbour, making use of the locks and is also used for pedestrian access. The SA welcomes the priority for Character Area 5 in relation to improving the PROW and the priority for Character Area 1 for improving specific roads for cycling and walking.</p> <p>The policy proposes certain amounts of development, including 400 residential units within the Brighton & Hove area of the Harbour, as well as 7,500sqm of additional employment floorspace. This additional amount of development in the area is likely to have some traffic impacts, either as a result of the newly located residents, from people travelling to the Harbour for work, or from increased vehicles related to a potential increase in port activity and therefore a negative score is awarded.</p> <p>The priority for the North Quayside/ South Portslade area to develop a new access road may help improve access to the port and improve congestion around the Kingsway/Wharf Road junction, as well as reduce volume of heavy good vehicles between this junction and the Church Road/Kingsway junction, although this would benefit from transport modelling to ascertain impacts.</p>		-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
7) Minimise risk of pollution to water	The SFRA 2012 shows that some areas within the site are at risk of surface water flooding in both the 1 in 30 and 1 in 200 year event. This would need to be considered when planning development. Surface water flooding can result in pollution to water resulting in a negative score against this objective. The area is also within the EA's major aquifer high vulnerability zone and consequently could be susceptible to groundwater emergence. However the SA recognises that the policy requirement to accommodate future capacity requirements relating to waste water treatment will have positive impacts on this objective. Overall the impact is therefore considered to be mixed.		-/+	-/+
8) Minimise use of water	The South East has undergone periods of high water stress therefore measures to reduce water consumption are critical. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water saving technologies.		-	-
9) Promote development of contaminated land	The Harbour area has been subject to many phases of industry including the former Portslade Gas Works, Timber Yards, Power Stations and Coal House. These former land uses, as well as existing land uses have the potential to have caused contamination. Any development within the area has potential to remediate previously contaminated land, and therefore is likely to have a positive impact on this objective. The SA recommends that more specific wording in relation to promoting remediation of contaminated land could be contained within the detailed JAAP policy.		+	+
10) Manage coastal defences and minimise coastal erosion and coastal flooding.	The SFRA 2012 identifies that 26% of the development area is situated within flood zones 3a and 3b. In addition, the SFRA considers wave over-topping to be a significant risk in this area, and this has not been considered in the designation of the flood-zones, potentially meaning that a greater extent of the area could be at higher risk. The SFRA also found the area to be at increased risk of flooding due to climate change. The SA notes that parts of the development area are situated within flood zones 3a and 3b and therefore development situated within these areas are at high risk of flooding. The impact on this objective is therefore considered to be negative. All development proposals should carry out a site specific flood risk assessment and any development proposals for more vulnerable uses would need to pass the sequential and exception tests. The SA notes that the recommendation put forward in the previous SA of the draft City Plan (May 2012) regarding flood risk has been included.		--	--
11) Employment: balance needs of tourists, residents and businesses	Some of the LSOA located within South Portslade fall within the most 20% deprived in the UK in terms of education and skills, and also suffer from employment deprivation (IMD 2010) and the policy makes specific reference to the worsening pockets of deprivation. The policy states that 7,500sqm of additional employment floorspace will be located within the Development Area. This could be floorspace that is associated with the port-based		+	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	industries, or other types of employment uses, including office space, restaurants, cafes, leisure and tourism related uses, all of which will provide employment opportunities. In addition, employment opportunities will be provide at construction stage. One of the main aims of the policy is for the Harbour to benefit existing and future communities, and it is presumed that this includes through the provision of employment opportunities and it is recommended that the JAAP policy specifies that employment opportunities will be provided for local people, particularly at construction stage.			
12) Support economic development	One of the main aims for Shoreham Harbour is to maximise its potential for business and Port-users, and to enhance the operations of the Port recognising the vital role it plays in the local economy. The delivery of mixed-use developments including employment space is also one of the aims for the area. The policy should have a positive impact on this objective through the delivery of new and improved port operational facilities, which should increase the operational use and output of the Port, through improvements to the business environment of existing non-port employers, through provision of 7500sqm additional employment floorspace (to be delivered within Brighton & Hove) for a range of uses and through the redevelopment of currently under-used spaces. In addition, the safeguarding of the wharves for minerals will also have positive impacts on economic development, with the Port being of regional importance for the landing and handling of minerals. The benefits to the local economy are likely to become more significant in the long term. The designation of the South Portslade Industrial Area as a Strategic Employment Area, potentially incorporating residential development could bring about the redevelopment of the lower-grade employment areas potentially having economic benefits and is not considered to have a negative impact on this objective. The mix of residential and employment uses in the Port may also bring about economic benefits to the nearby local centres, including the Boundary Road/Station Road District Centre.		+	++
13) Improve health	Health based deprivation (measured by the IMD2010) varies widely within the South Portslade ward, ranging from being within the most 6.6% deprived LSOAs in the UK, to within the 47.1% most deprived LSOAs. The regeneration of the Harbour area to include provision of housing, employment opportunities, improved quality and access to existing open space and to other local connections and leisure opportunities should help to bring about a positive impacts, with all being wider determinants of health. However, air quality is currently an issue in this area, and air quality may worsen as a result of the traffic impacts of development, potentially bringing about negative impacts on heath, and this is reflected in the mixed -/+ score. This will be dependant on where and how sensitive development is situated and could be mitigated through careful design within the Development Area, however may impact on adjacent areas that already suffer from		-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	poor air quality and that do not have the capacity to change. See ob 2.			
14) Integrate health and community safety	There is no specific objective regarding community safety, however improvements to sustainable transport, improvements to the streetscape and public realm, and improvements to key gateway routes all have potential to bring about positive impacts.		+	+
15) Narrow the gap between deprived areas and rest of the city	Two of the LSOAs within the South Portslade ward are within the most 20% deprived LSOAs in the UK (overall deprivation IMD 2010) and deprivation varies widely within the ward itself. Domains where LSOA within the South Portslade ward are in the 20% most deprived in the UK include income deprivation affecting older people, health, education & skills, children & young people, housing, and living environment. Employment (at 20.1%) is also an issue in some LSOAs. Two of the LSOA in the Wish ward are situated along the eastern edge of the Development Area, with these LSOA having most significant levels of deprivation in the wider barriers and living environment domains. Regeneration of the harbour area has potential to reduce deprivation among some of these domains as has potential to bring about benefits to the existing local community, provided that the needs of the existing local community are met. The SA recognises that the main aims includes bringing benefits for existing as well as future residents, as well as the fact that development plans for the harbour area are driven by worsening pockets of deprivation.		+	+
16) Engage local communities	All LDF documents include periods of public consultation. The JAAP and accompanying SA will be subject to widespread consultation.		+	+
17) Make the best of previously developed land	The entire development area is situated on previously developed land. Some of the development area includes under-used and vacant employment sites, the value of which could be improved. It is assumed that new development, and consolidation of existing development will make better use of this land.		+	++
18) Sustainable energy	In general, an increase in development is likely to lead to an increase in energy consumption. The policy itself does not set standards, in terms of BREEAM or similar, however it is assumed that the standards set out in CP8 will apply or may be detailed further in the JAAP. As a result of the main modifications, the policy now includes the aim to maximise low and zero carbon technologies, particularly those that take advantage of the coastal location and this is considered to potentially bring about significant positive impacts in the longer term. The policy also encourages developers to consider heat network systems for current or future development, and this should also help to bring about positive impacts. In addition, government targets for all new homes to be zero carbon by 2016 and non-residential development to be zero carbon by 2019 should also help to ensure high standards in terms of energy efficiency are met and therefore overall, the policy should bring about positive		+	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	benefits against this objective. Widespread re-development of existing buildings in the area also provides the opportunity to increase their energy efficiency and should be encouraged.			
19) Taking account of the changing climate	The potential impacts of climate change include an increase in extreme weather events, e.g. droughts, storms and heavy rainfall, as well as predicted rises in sea level which will increase the likelihood of tidal flooding. The SFRA 2012 outlines areas which will be at risk of tidal flooding as a result of the effects of climate change and this includes areas situated within the JAAP boundary, with risks of flooding increasing with climate change. Development in this area is therefore considered to be at greater risk of the impacts of climate change, particularly coastal flooding with climate change reducing the effectiveness of the existing sea defences over time.		-	--
20) Meet BREEAM / Code for Sustainable Homes	There is no specific requirement in the policy for development to meet certain standards, however it is assumed that this will be set out in the JAAP.		-	-
21) Increasing accessibility	One of the priorities for Character Area 2 is to improve access arrangements to create better links to surrounding areas; one of the priorities for Character Area 3 is to improve connections to Boundary Road/Station Road and Church Road areas; and in addition, the priority for Character Area 5 is to improve access to the PROW corridor, beach and public areas. The policy is therefore considered to have a positive impact on this objective as should improve and increase accessibility.		+	+
22) Reduction of waste	In general, an increase in development will lead to an increase in production of waste both at construction and operation stages.		-	-

Appendix 3 – Suggested requirements for Flood Risk Assessments (source: Brighton & Hove SFRA)

Flood risk assessments for Flood Zone 3a

A detailed site specific FRA should be undertaken. It is strongly recommended that the Sequential Test, and, depending on the vulnerability of the development¹⁴, the first two parts of the Exception Test be satisfied before the FRA is commenced.

The FRA should meet the following criteria:

- If the development is within tidal Flood Zone 3a, assess the flood risk from a breach in, or overtopping of, the tidal defences, and the risk from wave overtopping.
- Where necessary demonstrate whether the site is at residual risk from tidal flooding.
- Identify and detail the level of risk to a development from all sources.
- Detail how all sources of flood risk will be managed and the consequences mitigated.
- Where possible show how overall flood risk will be reduced.
- Undertake a drainage impact assessment to identify the impact of the proposed development on surface water drainage, including the potential impact upon neighbouring areas, and recommend the approach to controlling runoff to the required discharge rates.
- Show that safe access can be provided to an appropriate level for the type of development.
- Show that flood flow routes are preserved and floodplain storage capacity is not reduced.

Detailed FRAs should be undertaken by a suitably qualified professional. Assessments should be on a site by site basis making use of local knowledge, but an initial assessment of potential sources of flooding can be made by consulting the maps in this SFRA.

¹⁴ See paragraph 66, National Planning Practice Guidance



**Brighton & Hove
City Council**