

Brighton & Hove City Council

For general release

Meeting: Sustainability Commission

Date: November 1st 2006

Report of: Director of Environment

Subject: Sustainability Appraisal of the Core Strategy

Wards affected: All

1. Purpose of the report

- 1.1 To bring the draft Sustainability Appraisal Report of the Core Strategy to the Commission.

2. Recommendations

- 2.1 That the Commission endorses the Draft Sustainability Appraisal Report and comments made by the Sustainability Team.

3. Background

Consultation on the *Core Strategy* and the *Sustainability Appraisal Report*

- 3.1 The Draft Sustainability Appraisal Report will go out to statutory Public consultation from November 9th to December 21st 2006.
- 3.2 Consultation on the Core Strategy consists of three stages:
i) *Issues and Options* October 2005 to May 2006
Gathering Information and views on key issues for the future.

ii) *Preferred Options* November- December 2006
Possible options for the way forward based on the results of community involvement, the sustainability appraisal, national and regional planning guidance and background technical reports. Formal six-week consultation period.
The *Draft Sustainability Appraisal* for the Core Strategy goes out to public consultation at the same time as the *Preferred Options Paper*.

iii) *Submission* August - September 2007
Fully-worked up policies that the Council submit to the Planning Inspectorate leading to a public inquiry or examination. Formal six week consultation period.

- 3.3 A report on the Core Strategy Issues and Options was presented to Policy and Resources Committee on September 28th 2006 and to Full Council on October 19th 2006. This report incorporated findings from the Draft Sustainability Appraisal

Format of this report

- 3.4 A new format for bringing Sustainability Appraisal Reports to the Commission was proposed at the meeting of 24th May 2006. The proposed format was as follows:
- An executive summary of the document being appraised (in this case the Core Strategy)
 - An executive summary of the draft Sustainability Appraisal Report
 - A summary of recommendations from the Sustainability Team for the members to consider

4. Executive Summary of the Core Strategy

- 4.1 This is the document that will provide the overall spatial vision for the future of the city. It will address the important citywide matters such as housing, the economy, shopping, transport, tourism, community safety, urban design and regeneration. At the heart of the Core Strategy, running through all its themes, will be the principles of sustainable development. The Government expects that the Core Strategy will:
- Generally match up with the strategic policies in the South East Plan - the council's vision and objectives must reflect this Plan
 - Take forward the planning related aims and commitments of the Community Strategy, which sets out the wider vision for Brighton and Hove up to 2020
 - Take into account and integrate with other city-wide plans and strategies, including the Local Transport Plan

- Translate the Government's national planning policy into the local context, particularly Planning Policy Statement 1: Delivering Sustainable Development.

5. Executive Summary of the draft Sustainability Appraisal Report

- 5.1 The full *Draft Sustainability Appraisal Report on the Local Development Framework Core Strategy* is available on request and can be viewed on the council website at: www.brighton-hove.gov.uk/index.cfm?request=c1147843.
- 5.2 The *Draft Sustainability Appraisal Report* is over 400 pages long. A Non Technical Summary document has been prepared which focuses on the key element of the Core Strategy: the Growth Options. The summary document has been sent to commission members.
- 5.3 This document summarises:
- sustainability issues facing Brighton & Hove (pp4-8)
 - the 23 Core Strategy spatial objectives (pp8-11)
 - the 22 sustainability objectives for the SA report (pp11-12)
 - the four options for growth from the Core strategy 'Issues and Options' paper (pp12-13).
 - Recommendations made as a result of the SA report ('suggested mitigation for growth options' pp13-15)
- 5.4 Section 8 from the full *Draft Sustainability Appraisal Report on the Local Development Framework Core Strategy* contains the analysis of the potential impacts from the different Growth Options. It then gives mitigation measures required in pursuance of sustainability. This Section is summarized in appendix one.
- 5.5 The Growth Options set out five possible broad approaches to accommodating the predicted growth of the city over the next 20 years. It is indicated that the preferred option is likely to combine two or more of these approaches. The Growth Options include:
- A An accessibility - led approach
 - B A regeneration - led Approach
 - C An urban character / urban capacity - led approach
 - D Limited development and expansion on the urban fringe
 - E Identification of large strategic development sites (this option was based on the potential to create a man made island offshore and has been dismissed as unfeasible)

How the Sustainability Appraisal has influenced the Core Strategy

- 5.6 The *Sustainability Appraisal* is produced alongside the Core Strategy, which critically examines its objectives and options and tests them against the principles of sustainable development. This is a two way

process; the *Sustainability Appraisal* contributes to the reasoning behind, and the refinement of the *Core Strategy* overall and contributes to the progress of approaches made from the *Issues and Options Paper* through to the *Preferred Options Paper and the Site Allocations Paper*.

- 5.7 The *Sustainability Appraisal* has fully appraised all the Growth Options in the Issues and Options Paper using the 23 Spatial Objectives and the 22 Sustainability Objectives. These tables can be viewed in the full Draft Sustainability Appraisal report.

Mitigation Measures recommended by the *Sustainability Appraisal*

- 5.8 The *Sustainability Appraisal* finds that there are positives and negatives associated with all of the Growth Options A-D. Given that all development contributes to climate change and increased burden on natural resources, environmental considerations should be absolutely central to any planned growth options in the city and must be central to the *Core Strategy*. Environmental factors are also key to optimal quality of life and this should be reflected in design parameters laid out in the *Core Strategy*.
- 5.9 None of the Growth Options should be used in isolation but should be combined to address sustainability issues raised by each.
- 5.10 The results of the Urban Capacity Study, Open Space Survey and the Urban Characterisation Study should be combined with any growth option chosen. Health Impact Assessment (HIA) should be included in any large development proposals.
- 5.11 It may be necessary to allow limited growth on the urban fringe but any growth should be limited and must be accompanied by a high standard of sustainable transport measures and other mitigation measures outlined below.
- 5.12 Growth in deprived areas of the city must be accompanied by improved access to essential services, provision of employment and sustainable transport. These areas may not be able to accommodate higher density until social conditions have improved.
- 5.13 New developments offer the best opportunity to fully integrate sustainability into their design, without which the ecological footprint of the city will grow and sustainability will not be achieved.
- 5.14 New developments must incorporate water efficiency measures.
- 5.15 Sustainable Urban Drainage must be incorporated into new development to prevent flooding and pollution to water resources.

- 5.16 Adaptation to predicted climate change must be considered in the design of new development (e.g. extreme weather conditions, flooding). Recommendations within the Draft and Final Climate Change Action Plan for Brighton & Hove must be implemented in new development.
- 5.17 Biodiversity should be integrated into new development in order that a net gain in biodiversity occurs across the city.
- 5.18 The sections of coast near Brighton Marina are a Special Site of Scientific Interest (SSSI) and have suffered from retreating cliffs. New developments in the Marina must consider adverse affect they have on the SSSI.
- 5.19 It is recommended that all developments meet Ecohomes/BREEAM 'excellent' standard.
- 5.20 New development will increase the volume of waste arising from the city. All development should include material efficiency, waste minimisation measures and adequate recycling storage. A high proportion of construction and demolition waste must be reused and recycled.

6. **Comments and Recommendations from the Sustainability Team**

- 6.1 The *Sustainability Appraisal* is an extensive and robust document and covers all relevant issues. It provides a thorough list of measures to mitigate against potential negative impacts. The appraisal looks at the environmental, social and economic impacts of the Core Strategy, but mitigation measures focus on environmental impacts. This is a positive focus, as there is increasing recognition that there must be an environmental bottom line in order that sustainability is achieved.
- 6.2 The Sustainability Team assessment makes some further comments on the potential impacts of the Growth Options and also some comments on the mitigation measures, but fully endorses the findings of the *Sustainability Appraisal*.
- 6.3 All the *Sustainability Appraisal* comments on the Growth Options are summarised in Appendix one. These are noted in a table describing potential positive and negative impacts. The Sustainability Team comments are added into this table in bold.
- 6.4 The following are additional comments on mitigation and issues raised by the Sustainability Appraisal:

6.5 Sustainable Development

The overarching aim of the new planning framework is 'sustainable development'. Yet any form of development will: increase the city's use of energy, water and resources; increase the need for sustainable transport; increase the amount of waste produced; and increase the city's impact on climate change through increased greenhouse gas emissions. There will always be a tension between sustainability and development, even for those developments pursuing a low ecological footprint, low carbon or zero energy design. The aim of 'sustainable development' is a challenge that is at best difficult to achieve, but will simply not be achieved unless sustainable building design is absolutely central to every new development.

The *Sustainability Appraisal* has stated exactly this point, and all mitigation measures recommended in the report pursue this aim. It remains the responsibility of the council to ensure that these mitigation measures are put into place through development plan documents, supplementary planning documents and the work of the planning authority.

6.6 Food Access, food poverty

There has been a decline of small independent shops in the high street and neighbourhood parades (local centres) resulting in residential areas where there is little or no access to local shops selling fresh produce. There is evidence that families on low incomes are more likely to suffer from 'food poverty' (where there are issues around access and availability to, and affordability of nutritious food) and diet related illnesses. Planning has not in the past recognised the need to address issues around food poverty and access, but these issues should be addressed through Health Impact Assessment, and Retail Studies carried out by Planning, and factoring in space for fresh food retail outlets within residential communities to avoid the creation of or contribution to food deserts.

This reflects the city Food Strategy aim: 'to increase access for all residents within the city to nutritious, safe, affordable food'.

6.7 Adaptation to climate change

This is discussed in the *Sustainability Appraisal* in relation to flooding and extreme weather events. Other potential climate change impacts which should be explored, clarified and included in guidance provided by the planning authority might include: information on risks of subsidence due to summer drought and heavy winter rainfall, strengthening foundations to deal with increased subsidence risk; upgrading wastewater systems to deal with flooding brought on by intense rainfall; the ability for buildings to passively deal with higher summer temperatures; urban tree planting to reduce summer street temperatures; and potential sea level rise looking at different scenarios predicted and how this may affect coastal areas.

6.8 Bathing water quality

Mitigation measures recommended by the *Sustainability Appraisal* look at sustainable urban drainage to prevent flooding and water pollution. This must also consider the impacts of flooding on bathing water quality in the sea both in and around Brighton & Hove as a result of overflows from sewers in heavy rainfall. There must be adequate wastewater infrastructure to deal with increasing extreme rainfall events predicted for the future.

6.9 Wastewater treatment

The Appraisal notes the need to have adequate provision of water to new development in the city. There must also be adequate wastewater infrastructure and sewage treatment plant to deal with increasing volumes of wastewater.

6.10 Other than those comments in 6.3 – 6.9 the *Sustainability Appraisal* is found to be a complete and comprehensive appraisal.

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Financial implications

There are no direct financial implications from this report at this time. Further assessment will be made in the later stages for the strategies development.

Finance Officer consulted: Alasdair Ridley Date:20/10/06

Legal implications

"The core strategy is a development plan document as prescribed by the Planning and Compulsory Purchase Act 2004. Development plan documents, in turn, form part of the development plan which is the essential framework for planning decisions.

The core strategy should set out the key elements of the planning framework for the local planning authority area and should comprise: a spatial vision and strategic objectives for the area; a spatial strategy; core policies and a monitoring and implementation framework.

Section 39 of the 2004 Act imposes a duty on local planning authorities when exercising their functions in relation to local development documents (of which the core strategy is one) to exercise those functions with the objective of contributing to the achievement of sustainable development. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the process to ensure that decisions that are made accord with sustainable development.

This Report complies with the requirements for sustainability appraisal as set out in section 39 of the Planning and Compulsory Purchase Act 2004 and The Town and Country Planning (Local Development) (England) Regulations 2004."

Lawyer consulted: Hilary Woodward 18th October 2006

Corporate/Citywide implications

The Core Strategy will contribute to delivering plans and strategies across the city council directorates, along with the Sustainable Community Strategy. It will also help to deliver external city-wide strategies, e.g. of the Primary Care Trust.

Risk assessment

The risks within this project (Production of the Local development Framework) are regularly reviewed through quarterly highlight reports.

Sustainability implications

The Core Strategy has the aim of sustainable development and integrates the environmental, economic and social objectives of creating sustainable communities. The

Equalities implications

Equalities issues are relevant to a number of the Core Strategy issues, particularly in relation to narrowing the gap between deprived areas and the rest of the city, providing community

document is subject to a full Sustainability Appraisal.	facilities and providing for housing for all, including gypsies and travellers. Community involvement specifically attempted to reach the various Communities of Interest.
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Implications for the prevention of crime and disorder
The Core Strategy contains preferred options specifically on community safety, to reflect the priorities of the Sustainable Community Strategy theme of Reducing Crime and Improving Safety.

- Background papers**
1. Draft Sustainability Appraisal of Core Strategy
www.brighton-hove.gov.uk/index.cfm?request=c1147843.
 2. Core Strategy Issues and Options Paper
www.brighton-hove.gov.uk/index.cfm?request=c1148443
 3. Core Strategy Preferred Options document

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APPENDIX 1

Summary of Sustainability Appraisal comments on Growth Options from Section 8. These potential positive and negative impacts have been identified by the SA Report, and are classified under the headings from the and are *Additional comments from Sustainability Team added in bold*

A Accessibility led approach

This would involve optimising development within the built-up area by identifying areas of growth opportunity for higher density development based primarily upon their accessibility to sustainable travel. Such an approach would cover both housing and employment uses. It would be likely to mean development concentrated around sustainable transport corridors (such as Eastern Road/Edward Street) and nodes (such as Hove Station) and around the city centre, town centres (Hove and London Road) and district centres (St James's Street, Lewes Road, Brighton Marina and Boundary Road/Station Road). This approach could also take into account how close sites are to public open space.

Positives	Negatives
<p><i>Living within Environmental Limits</i> This growth option focuses on development occurring around transport corridors, which will lead to improved sustainable transport provision, increased transport accessibility and has the greatest benefits to improving air pollution levels by reducing the need for the use of private cars.</p> <p>This option is likely to make the best use of previously developed land around transport corridors.</p>	<p><i>Living within Environmental Limits</i> Any new development across the city will put pressure on already stretched resources; the carry capacity of the city is already exceeded and the city ecological footprint is 6.49gha/cap, which is 20% higher than the UK average and there is a possibility that the EF will raise over the next ten years, at a relatively slow rate. <i>(APPLIES TO ALL OPTIONS)</i></p> <p>Pollution and car use levels may not decrease across other areas of the city even if they remain stable or improve in these areas.</p> <p>The option is solely based on accessibility; therefore the effects of new development on the city's historic landscape, parks and buildings may not be taken into account. Local distinctiveness may be lost.</p> <p>If development occurs solely along transport corridors, opportunities to use previously developed land elsewhere in the city not be developed to their best potential.</p>

	<p>The accessibility approach does not take into account the urban capacity study for these areas. Therefore it is unknown whether enough housing can be built to meet the housing needs of Brighton and Hove. It may be determined at a later date that these areas cannot provide for the housing needs of the City.</p> <p><i>Some of the sustainable transport corridors noted in this option for development pass through Air Quality Management Areas (AQMAs) where congestion and pollution are already a problem (e.g. Lewes Rd & London Road). This is likely to have a negative impact on air quality and congestion in these areas and would require focused mitigation and management.</i></p> <p><i>Although this approach looks at the importance of proximity to public open space, it focuses very much on increasing density in existing built up areas and this could have a negative impact on biodiversity.</i></p> <p><i>Quality of life may be compromised by increasing density of already built up areas. Mitigation measures must look at optimal urban design.</i></p> <p><i>This approach does not increase sustainable transport provision and access to outlying areas of the city.</i></p>
<p><i>Achieving a Sustainable Economy</i> If employment increases in these areas, employment opportunities may become more accessible to the local community.</p> <p><i>This option may result in the regeneration of these areas, through bringing increased employment, services, residents and businesses to these areas. Some of the areas (e.g.</i></p>	<p><i>Achieving a Sustainable Economy</i> If all types of economic development were to take place only around transport corridors, other areas of the city may be negatively affected.</p> <p>If pressure is placed on areas that are currently valued for tourism, resulting in loss of character, significant long-term impacts may occur.</p>

<p><i>London Road and Lewes Road) have been identified as areas which are in decline and would benefit from regeneration and development.</i></p>	<p><i>The effects of focusing redevelopment in these areas may not have an overall negative economic impact on retail and other businesses in outlying areas of the city.</i></p>
<p>Ensuring a Strong Healthy and Just Society As this option takes into account how close sites are to public open space, and increased access to open space, this is likely to have positive impacts on quality of life and health.</p> <p>If development is concentrated around transport corridors, and sustainable transport provision is increased, traffic congestion should be reduced in these areas, which will benefit the health of residents and employees in this area.</p>	<p>Ensuring a Strong Healthy and Just Society Improvements to transport congestion will benefit those working and living in these areas, however congestion may increase in other areas of the City reducing the quality of life of those living outside areas of sustainable transport corridors. in other areas of the City</p> <p>The accessibility option does promote transport links with housing and employment, but only along existing transport corridors, therefore accessibility to health services, education, jobs, and food stores that exist in other areas of the city may not be improved.</p> <p><i>This option does not address issues of deprivation and the need for redevelopment (services and employment) in outlying areas of the city so may therefore accentuate social and economic disadvantage in these areas.</i></p>
<p>Promoting Good Governance & Results of consultation The options have been out for consultation with members of the Brighton and Hove community, the overall findings were supportive of this approach but not if taken in isolation.</p>	

B A regeneration – led approach
This would involve optimising development opportunities within the built up area by identifying areas of growth opportunity based upon regeneration needs, directing new development towards the East Brighton “eb4U” area and the other Neighbourhood Renewal Fund areas.

Positives	Negatives
<p>Living within Environmental Limits This approach to growth would be positive if brown field sites in these areas were improved and biodiversity</p>	<p>Living within Environmental Limits Any growth will put pressure on already stretched resources and increase the city’s ecological footprint.</p>

<p>was integrated; a net gain in biodiversity could be achieved.</p>	<p>Directing development to the deprived areas of the city is likely to have a direct impact on congestion and air quality. Accessibility in these areas would need to be improved and sustainable transport would need to be at the forefront any regeneration.</p> <p>This option does not include the use of the urban characterisation study. Regenerating these areas may lead to a loss of local distinctiveness and there maybe a visual impact on landscapes.</p> <p>This option does not necessarily make best use previously developed land with capacity for growth elsewhere in the city.</p> <p><i>This approach does not implicitly address sustainable transport access and provision to these areas.</i></p> <p><i>There are a number areas in the city which are not included in Neighbourhood Renewal (NR) Fund Areas but which have high levels of deprivation that also require regeneration. If this approach is adopted these other areas should also be considered.</i></p> <p><i>There are already issues around food access in many of the outlying and NR areas of the city (where there is no fresh food retail outlet within walking distance from people's homes). The issue of access to fresh food outlets should be considered and addressed.</i></p>
<p><i>Achieving a Sustainable Economy</i> The benefits towards the deprived areas of the city maybe very large if easily accessible employment opportunities are created. Regeneration of deprived areas may take existing pressure off the city</p>	<p><i>Achieving a Sustainable Economy</i> By focusing development only in regeneration areas, other areas of the city may suffer and this may result in economic deprivation in the future to other areas of the city.</p>

<p>centre.</p>	<p>The regeneration approach does not take into account the urban capacity study and Urban Characterisation study for these areas. Therefore it is unknown whether enough housing can be built to meet the city housing needs. The studies may identify areas in East Brighton and NRA's that are unsuitable for development.</p> <p>At present East Brighton and the NRA's do not form part of the tourism sector, tourism is focused in the City Centre and this is where the main attractions exist. Consideration would have to be given to how this option could aid the tourism sector.</p>
<p><i>Ensuring a Strong Healthy and Just Society</i> If development and regeneration is concentrated in East Brighton and NRA's, levels of health for these communities are likely to improve, as access to open space and health services as well as employment is created.</p>	<p>Ensuring a Strong Healthy and Just Society Increasing density will increase the population of these areas and without a sustainable transport initiative the areas may become congested increasing pollution levels.</p> <p>If the option for growth is chosen without an HIA being carried out it would be impossible to identify any existing problems in the areas and therefore the impact of any further development.</p>
<p><i>Promoting Good Governance & Results of consultation</i> During Consultation there was a mixed response to this approach. In surveys there was support for this option; however, consultation with some of those directly involved with the neighbourhoods raised concerns about the need to ensure significant improvements to the physical and social infrastructure of the neighbourhood renewal areas before directing any substantial new housing development towards them. This option will take into account previously developed land across the city and the results of the consultation process will be included in any growth option.</p>	

C - an urban character /urban capacity-led approach

This would be based on the findings of three studies, which are either underway or have recently been produced. The Urban Characterisation Study will identify, describe and map the distinct urban, suburban and rural neighbourhoods of the city and subdivide these into character areas based on an analysis of the

topography, street patterns, building forms, land uses, density and open space in each area. The Urban Capacity Study review will establish how much additional housing could be accommodated in the urban areas of the city by a thorough identification of potential sites. The Tall Buildings Study defines broad areas of the city that are suitable for tall buildings (6 storeys or more in height) and identifies nine such potential areas.

Positives	Negatives
<p><i>Living within Environmental Limits</i> This option defines the character of each ward in Brighton and Hove and identifies the following: Wild space high in species diversity Amenity space low in species diversity Regenerating scrub Mature tree planting Woodland Allotments Therefore this option has the greatest benefits for achieving a net gain in biodiversity, by providing information on the existing baseline data from which nature conservation features must be enhanced.</p> <p>The characterisation study identifies AQMA areas in the city, as well as road noise, excessive dust, transport corridors and pedestrian permeability in wards across the city, this information can be positively used towards future development.</p> <p>This option will use studies on local distinctiveness, historic landscapes, townscapes, parks, buildings and archaeological sites in order to identify where there is capacity for growth. This option would therefore be the most beneficial in identifying where appropriate growth might occur.</p> <p>This option will identify transport corridors and pedestrian permeability, which will help to achieve better accessibility and sustainable transport corridors. All new development would need to be</p>	<p><i>Living within Environmental Limits</i> Any growth will put pressure on already stretched resources and increase the city's ecological footprint.</p> <p><i>Without knowing which areas are identified by the Studies as having capacity for growth, it is impossible to assess what the environmental impacts might be.</i></p> <p><i>This approach looks at increasing density through carefully integrating development into areas that have capacity for growth. This is positive so long as there is adequate access to services (health, education etc), sustainable transport and appropriate food retail outlets.</i></p> <p><i>This approach may also put pressure on schools which are already oversubscribed.</i></p>

<p>compact, mixed-use, car-free and high-density development to be in line with UK policy.</p> <p>This option is likely to make the best use of previously developed land in Brighton and Hove.</p>	
<p><i>Achieving a Sustainable Economy</i> This option will identify any major tourist attractions and their position near transport corridors and the effects this has on local residents. So the results will be beneficial towards achieving this objective. The combination of these studies should enable economic development to occur in the most appropriate parts of the city, without severe implications to the environment.</p>	<p><i>Achieving a Sustainable Economy</i> <i>This approach may result in development occurring in areas where there is already a strong local economy, rather than directing development and importantly, regeneration into areas which may benefit from investment and development.</i></p>
<p><i>Ensuring a Strong Healthy and Just Society</i> Community safety issues are identified in the characterisation study, this identifies crime hot spots and assesses why these might areas exist. This option will identify the socio-economic characteristics: areas of deprivation, crime, and economic centers, /employment centers as well as mapping areas of distinct character that need to be protected and enhanced against areas that are able to accommodate change, against areas that need change.</p>	<p><i>Ensuring a Strong Healthy and Just Society</i> The characterisation study will identify areas of social deprivation, but not specific issues related to health in areas across the city. Therefore it is recommended that an HIA be carried out on any areas that are identified by these studies as being suitable for development.</p>
<p>Promoting Good Governance & Results of consultation This option was the most difficult approach for people to judge properly as it largely relies on two pieces of research that had not been completed at the time of consultation. However this approach received a significant level of support in principle, it was seen as pro-active which could help to identify where investment should be best steered. It was seen as being a particularly suitable approach for incremental change, rather than large-scale redevelopment, and one that would help to safeguard quality and local distinctiveness. There were concerns that in isolation this approach may not be a good one for securing supporting infrastructure and services but that it could be combined with other approaches.</p>	

D – Limited development and expansion on the urban fringe

This would still mean optimising development opportunities within the existing built-up area but, in addition, allows for limited encroachment into the countryside if this can be justified in the long term (beyond the next 10-15 years). This would include areas of poor quality 'urban fringe' on the outer edges of the city and open areas of land, which are not included within the National Park and are therefore no longer subject to any formal designation.

Positives	Negatives
<p><i>Living within Environmental Limits</i> This option focuses on development within the existing built up area but in addition allows for limited encroachment into the countryside. If the development was limited to areas of poor ecological quality only and biodiversity was integrated into the development then a net gain in biodiversity in these areas may be achieved.</p>	<p><i>Living within Environmental Limits</i> Any growth will put pressure on already stretched resources and increase the city's ecological footprint.</p> <p>This option would need to consider how accessibility in these areas would be achieved; development on the urban fringe may increase traffic congestion in these areas and result in higher pollution levels.</p> <p><i>An effect of development on urban fringe is likely to be an increase in car journeys by those living or working in these areas. If this option is taken up it should be accompanied by adequate additional sustainable transport services.</i></p> <p><i>The approach specifies that development on the urban fringe occurs on 'areas of poor quality' and areas of 'open land'. This runs a risk of reducing wildlife habitats and if adopted must be subject to scrutiny through ecological survey and enhancement..</i></p> <p><i>Undeveloped areas of the city are crucial for allowing rainfall to penetrate the ground and filter down to replenish underground aquifers. Expanding the area of developed land outwards has implications for this natural process unless sustainable urban drainage systems are incorporated extensively.</i></p>

<p><i>Achieving a Sustainable Economy</i> Development on the urban fringe could potentially enhance visitor experience to the proposed South Downs National Park (SDNP) if a leisure/recreation element was included in the development and if it could also help to create a 'gateway' to the SDNP (South Downs National Park). This option may take pressure of the carrying capacity of the built up areas and in particular the historic built heritage of the central areas.</p>	<p><i>Achieving a Sustainable Economy</i> Residential and economic development on the urban fringe may not offer significant environmental protection for water resources, wildlife and air quality. This option does not promote tourism in the city.</p>
<p><i>Ensuring a Strong Healthy and Just Society</i> The carrying capacity of the city maybe reduced, which may result in better quality of life for local communities.</p>	<p><i>Ensuring a Strong Healthy and Just Society</i> Urban fringe development highlights concerns over the loss of leisure and open space, which can result in ill health for communities. An HIA should be carried out in these areas to identify any existing problems before development is approved.</p>
<p><i>Promoting Good Governance & Results of consultation</i> This option received a mixed response. It was not a popular approach amongst respondents to the Stakeholder Questionnaire and did not appear in any of the most common combinations of preferred approaches, though there was recognition that it may be acceptable under certain circumstances. However this approach did receive greater support from the Citizens Panel, where a very clear majority would support it under certain circumstances. The workshop sessions showed a strong presumption against any development on the urban fringe. Particular mention was made of the role of greenfield sites on the urban fringe play as an aquifer and the risk of pollution if they were to be developed. The future National Park was seen as being sacrosanct. Workshops with the local business community indicated support for some development on the urban fringe for high-quality employment uses.</p> <p><i>An approach of 'limited encroachment into the countryside' goes against the strongly upheld council policy of developing (particularly housing) on previously developed or brownfield sites. If the Planning Authority gives permission to development in locations that have been vociferously opposed in the past, this could be perceived as a U turn and create issues of council accountability.</i></p>	

