

<b>Policy</b>	<b>Assessment</b>
DA1 - Brighton Centre and Churchill Square Area	Policy needs reviewing to take account of changing retailer demand, trends, economic situation and an updated evidence base. Rewriting of policy likely in light of economic uncertainty.
DA2 - Brighton Marina, Gas Works and Black Rock Area	Policy should be retained but will need revised to reflect any progress with strategic site allocations, changes to the use class order and to ensure compliance with other council strategies. Some evidence base documents will need reviewing which may result in adjustments to the policy.
DA3 - Lewes Road Area	Consider whether policy is still required in light of major site allocations being delivered and few other major development sites. If policy is retained the deliverability of remaining site allocations can be assessed, Policy SSA7 in CPP2 incorporated, amendments due to UCO changes and consideration of revised priorities to reflect of Council Plan and national legislation. Also consideration of any specific measures needed to maintain health of the Lewes Road district centre.
DA4 - New England Quarter and London Road Area	A number of strategic allocations are still to be delivered. If policy is retained the deliverability of remaining site allocations should be assessed, and how to secure protection of employment sites in light of amendments to UCO / proposed PDR changes. Consideration of revised priorities to reflect of Council Plan and national legislation. Consideration of any specific measures needed to support the ongoing regeneration of the London Road Town centre and potential development opportunities.
DA5 - Eastern Road and Edward Street Area	Policy appears compliant with NPPF. Policy needs reviewing to update the current context, reflect changes in the UCO, and remove some site allocations.
DA6 - Hove Station Area	The policy is still relevant and should be retained but will need to be updated to reflect changed circumstances (Masterplan, Neighbourhood Plan & planning permissions now granted). The DA6 area has potential to accommodate a much higher level of development than indicated in the current policy. Sites not covered in detail in the masterplan should also be reviewed in terms of policy & development potential – e.g. Clarendon Ellen Estate, Newtown Road area & Goldstone Retail Park.
DA7 - Toad's Hole Valley	The whole site is likely to be subject to planning permission very soon, therefore it is not considered necessary to carry forward a DA policy for this area.
DA8 – Shoreham Harbour	The Development Area is entirely within the recently adopted Shoreham Harbour Joint Area Action Plan which sets out a detailed planning policy framework for the regeneration of the entire Shoreham Harbour area. It is not necessary to retain an additional specific policy for the area in a reviewed City Plan.
SA1 – The Seafront	Coordinated policy approach is still considered a valuable approach. Policy needs to be updated to take into account changes to council's seafront/waterfront projects/ regeneration priorities and align with consideration of sports facilities review. Strategic Allocation may need updating. Streamlining of supporting text and consolidation with CPP2 policies DM15, DM39, SSA5 and SSA6 could be considered.
SA2 – Central Brighton	Policy needs reviewing to take account of changing retail trends, economic situation and an updated evidence base. In particular the evolution of city centres post-covid will need careful consideration. Streamlining of supporting

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	text and consolidation with CPP2 policies DM12 and DM13 could be considered.
SA3 – Valley Gardens	Assess need for policy in due course depending on status of the Valley Gardens project.
SA4 – Urban Fringe	The basic policy principles will remain largely unchanged, but the policy wording & supporting text need to be updated to better reflect new and emerging national & BHCC priorities (see above). As part of the City Plan review, the UFA evidence on potential sites for housing (and any other strategically important development) will need to be reviewed and updated. Also, the updated policy will need to address the NPPF requirement to allow for exception sites for first time buyers/First Homes.
SA5 - The Setting of the South Downs National Park	Policy remains relevant but consideration should be given to consolidating with the urban fringe policy.
SA6 - Sustainable Neighbourhoods	Policy needs an update as it refers to outdated strategies and studies produced by the council, as well as to reflect the revised UCO and COVID effect.
CP1 - Housing Delivery	CP1 is the pivotal policy in the Plan in terms of setting the overall level & broad strategy for development, so it connects directly or indirectly to most other policies in the Plan. In terms of evidence, it will require an updated housing need assessment/ SHMA (which will also inform the updated Housing Mix and Affordable Housing policies). The key evidence for housing provision/delivery will come from the SHLAA, but this will need to be informed by many other studies/evidence looking at housing densities, urban fringe, requirements for other uses (employment, town centre etc), infrastructure, constraints and viability.
CP2 - Sustainable Economic Development	CP2 is a spatial planning policy setting out a supportive policy to help deliver the council's priorities, so it sets the framework for more detailed employment policies in the Plan related to safeguarding existing sites/ allocating new site. In terms of evidence, it will need to reflect Greater Brighton Economic Plan, Coast to Capital Industrial Strategy and Circular Economy Routemap as well an updated Employment Land study either combined with Housing land availability assessment and/or broadened out to other commercial uses (given changes to Use Classes).
CP3 - Employment Land	CP3 is the most pivotal policy in the Plan in terms of setting the overall level & broad strategy for employment land, so it sets the framework for safeguarding strategic employment land and site allocations. In terms of evidence, it will need to be underpinned by an updated Employment Land study either combined with Housing land availability assessment and/or broadened out to other commercial uses (given changes to Use Classes). The impact of the widened use classes and permitted development rights will impact on its effectiveness.
CP4 - Retail Provision	Policy needs reviewing to take account of changing retail trends, economic situation and an updated evidence base. The introduction of class E has affected the ability of planning policies to manage retail uses. Streamlining of supporting text and consolidation with CPP2 policies DM12 and DM13 could be considered.
CP5 - Culture and Tourism	The thrust of the policy is still relevant and only minor amendments are likely to be necessary to consider how policy could aid Covid-19 recovery, link to the

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	new Brighton & Hove Visitor Economy Strategy and consider some streamlining and consolidation with CPP2 Policy DM9.
CP6 - Visitor Accommodation	Policy needs reviewing to take account of changing circumstances in the visitor accommodation market and an updated evidence base. Streamlining of supporting text and consolidation with part of City Part Two Policy DM17 should also be considered.
CP7 - Infrastructure and Developer Contributions	Policy requires reviewing to reflect the introduction of CIL in Brighton & Hove. Future reforms to S106 and CIL resulting from proposals set out in the Planning for the Future White Paper may also need to be considered in a revised policy.
CP8 - Sustainable Buildings	An updated policy will be better able to support corporate priorities such as the zero carbon agenda and the Circular Economy roadmap. The policy is compliant with the current NPPF but will need updating to be reflect Future Homes Standard. The FHS may constrain the ability of the council to require net zero carbon in new developments by 2030 aspirations for whole carbon life cycle assessments or to introduce carbon offsetting requirements for when standards are not met. The Urban Design Framework SPD will provide guidance that supports CP8.
CP9 - Sustainable Transport	Review required to reflect updated corporate transport objectives set out in the latest Local Transport Plan and Local Cycling and Walking Infrastructure Plan. Streamlining of policy and consolidation with some CPP2 policies should also be considered.
CP10 - Biodiversity	The policy is compliant with the NPPF but will need updating to be reflect emerging legislation within the Environment Bill and the various resulting requirements, such as mandatory 10% net gain and Nature Recovery Networks. Some policy criteria could be deleted once CPP2 adopted and there is scope to integrate green infrastructure and nature conservation requirements which is currently set out in CPP2 Policy DM37. Unclear how Nature Recovery Networks will sit with existing landscape-scale approaches, already designated under the NIA, therefore further clarity required in this regard. Some evidence which supports the Green Network and NIA designation is not up to date and may need updating, however if NRN will replace the NIA it could be premature to update this evidence at review stage.
CP11 – Flood Risk	The policy is compliant with the current NPPF but will need updating to be reflect any changed guidance (government indicated flooding advice will be updated). Policy could be strengthened re: assessment requirements and to reflect DM43 SUDs
CP12 – Urban Design	Policy needs reviewing to reflect adoption of the UDF, and to update the tall building aspects and strategic views information. Supporting text can be streamlined.
CP13 - Public Streets and Spaces	Policy does not need reviewing. Supporting text should be simplified and reference in the last paragraph to CP8 Sustainable Building policy (or its replacement) should be added to strengthen links with overarching sustainability policy.
CP14 - Housing Density	The policy remains necessary and compliant with national policy but the minimum density targets will need to be reviewed (and possibly raised) following an assessment of an updated evidence base of recent permissions and densities achieved.

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CP15 - Heritage	The policy itself remains necessary and compliant with national policy, though any heritage regime reform arising from the White Paper will require a further review. The supporting text can be updated and reduced.
CP16 – Open Space	The principles of the policy are likely to remain largely unchanged, however there is a need to update the evidence base (which is now very out of date) and also reflect the introduction of CIL as the means of funding off-site open space provision. There is also scope to integrate LGS policy which is currently set out in CPP2 Policy DM38.
CP17 – Sports Provision	The need to safeguard, expand, enhance and promote access to sports service still remains and reflects current council strategies and plans. The evidence base which underpins the standards for indoor and outdoor sports provision is out of date and a policy review will enable further consideration of more recent national standards and emerging council strategies.
CP18 – Healthy City	The policy is compliant with the NPPF however it is unclear whether the policy will be compliant with emerging proposals put forward in the White Paper in relation to Sustainability Appraisal and Health Impact Assessment. Review of the policy would allow for various updates and edits to the supporting text, including edits to reflect the council’s zero carbon commitment and the impacts of climate change on health, recently adopted council strategies, such as the Health & Well-Being Strategy 2019, evidence within the JSNA, Government’s Obesity Strategy 2020 and publication of guidance provided to support implementation of HIA requirements.
CP19 – Housing Mix	Policy needs updating and potentially consolidating with CPP2 Policy DM1. Stronger emphasis should be given to housing quality (space & accessibility standards, private outdoor amenity space) and statutory requirement to provide for self & custom build housing should be reflected (with references to supporting community-led housing).
CP20 - Affordable Housing	This is a key policy for the Plan, especially given stated council priorities. AH policy requirements will have wider implications for overall housing strategy & delivery, plus knock-on impacts for other developer contributions. AH policy has become more complex due to expanded definition of AH & NPPF requirements at national level, plus emergence of new categories of housing (e.g build to rent, co-living). Policy review will require comprehensive update of evidence covering overall housing needs, need for different types, tenures & sizes of AH, and assessment of AH viability (factoring in housing standards & other required developer contributions inc CIL). More specific evidence could be sought to support expanding AH requirements to cover co-living, self-contained C2 units (e.g. extra care) & possibly also off-campus student accommodation.
CP21 - Student Housing and Housing in Multiple Occupation	Policy needs reviewing to update the context, remove site allocations and consolidate with City Plan Part Two policies. Criterion A6 needs to be re-worded to be effective and some other criteria could be removed to streamline the policy and avoid duplication.
CP22 - Traveller Accommodation	Policy needs revising to reflect updated evidence base documents and revised national planning policy that have been produced since the policy was adopted.