

Appendix E – Sustainability Appraisal Matrix – Extensions and Alterations SPD

Options
<p>1 - Do nothing. Rely on existing Local Plan policies and other existing local policies to provide guidance for extensions.</p>
<p>2 – Produce SPD to provide guidance in the design and planning principles to be taken into consideration when planning extensions to development, whether they need planning permission or not.</p>

Assessment methodology

As there are two options for consideration, a scoring system which uses up to two “+” symbols or two “-“ symbols has been used to help indicate the performance of the option relative to others. This only relates to the particular objective being assessed and can not be used to compare the objective with other objectives. The commentary provides more explanation and justification.

The following scoring system is used, with multiples allowed as described above:

Positive impact: +
 No impact: 0
 Negative impact: -
 Impact uncertain: ?

Sustainability Objective	Summary	Option	
		1	2
1. To achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.	<p>1. It is recognised that any development can cause harm to biodiversity, however it is considered unlikely that an extension would cause any significant harm. There is a range of existing policy that should ensure the protection of biodiversity from development, including extensions such as Local Plan policies QD16 Trees and Hedgerows, QD17 Protection and Integration of nature conservation features, and QD18 Species protection, as well as SPD11 Nature Conservation in Development. The impact on this objective should be positive.</p> <p>2. In addition to the policies outlined above, which would also be considered, the SPD contains various references which should ensure biodiversity is considered: the preliminary guidance section outlines consideration of Tree Protection Orders, as well as protection of trees in Conservation Areas; Appendix C cross refers to SPD11 Nature Conservation in Development; and Chapter 3 refers to retention of garden space. The impact on this objective is therefore considered to be positive, however is unlikely to be any more positive than Option 1.</p>	+	+
2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning.	There is no direct link to this objective.	0	0
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and archaeological sites effectively.	1. Badly designed or built extensions could have a significant negative impact on the local built environment, particularly in Conservation Areas and other areas of interest. There are a range of existing policies that would be applied to any planning application for an extension, including those within the Local Plan such as QD1, Design and QD14 Extensions and Alterations, as well as supplementary guidance such as SPD09 Architectural Features and SPG11 Listed Building Interiors. These will guide development and ensure any development or extension meets certain criteria. However these policies generally will only be used for developments	+	++

Sustainability Objective	Summary	Option	
		1	2
	<p>needing planning permission and are unlikely to be applied to those that are of permitted development.</p> <p>2. The promotion of good design and how this should be applied to extensions is the main aim of the SPD and therefore the SPD has a strong impact on this objective. The preliminary guidance specifies that the existing character of the building and its setting should influence the design of an extension. This section also includes basic design details including how materials should match those that are existing, the relationship between the extension and the adjoining properties and how the pitch of original roof should be considered. The impact that extensions can have on the street and neighbouring properties is reinforced throughout the SPD, with various guidance provided according to the type of extension. The preliminary guidance also includes a section on Conservation Areas, Buildings of Local Interest and Listed Buildings and cross refers to SPD09 Architectural Features. The SPD also included a chapter specifically on extending Listed Buildings, Buildings of Local Interest and buildings within Conservation Areas. The SPD is considered to have a significant positive impact on this objective, and is considered to have a stronger positive impact than Option 1 as it also guides development that does not require planning permission.</p>		
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.	<p>1. Much of the built up area in Brighton & Hove adjoins the boundary of the SDNP however it is considered unlikely that a (residential) extension to a property in the area adjoining the SDNP would have any significant adverse impact on the setting of the SDNP, or of views of or from the Downs. Existing Local Plan policies including NC5 Urban Fringe and NC6 Development in the countryside would apply to any planning application for development in this area and should result in protection of the South Downs.</p> <p>2. The SPD is considered to have a positive impact on this objective through the promotion of well proportioned and designed extensions to all properties, including those that are permitted development, as this will include those that are situated</p>	+	+

Sustainability Objective	Summary	Option	
		1	2
	<p>next to, but not within the SDNP, as these will fall under the jurisdiction of the National Park Authority. Section B of the SPD refers to limitations that may apply to properties due to the location within the SDNP. The impact of the SPD on this objective is not considered to be any more significant than the impact of Option 1.</p> <p>The SA notes that the National Park Authority have the planning function for properties located within the SDNP and although this will apply to only a small number of properties located within Brighton & Hove, the SA suggests that the contact details for the NPA could be included in the Useful Contacts and References section.</p>		
5. To meet the need for decent housing, particularly affordable housing.	<p>1. Although extensions or alterations to houses are not provision of housing or affordable housing as such, being able to extend a home to accommodate a household's changing needs is likely to be more cost effective than moving house and enables existing homes to meet housing needs. There are a range of existing policies that would be applied to any planning application for an extension, including those within the Local Plan such as QD14, which will continue to provide guidance.</p> <p>2. This SPD will provide specific guidance that householders need when planning an extension to their homes, including extensions which are permitted development. In addition, the SPD refers to considering Lifetime Homes standards, which will enable the long-term needs of the household to be met.</p>	+	+
6. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed use, car-free and higher-density development.	There is no direct link to this objective.	0	0
7. Minimise the risk of	1. New development can increase the risk of surface water run-off and pollution to	+	+

Sustainability Objective	Summary	Option	
		1	2
pollution to water resources in all development.	<p>water. There are a range of existing policies that would be applied to any planning application for an extension, including those within the Local Plan such as policies SU3 Water resources and their quality and SU4 Surface water run-off and flood risk that should ensure this risk is minimised. In addition, SPD 08 Sustainable Building Design, also incorporates requirements relating to extensions and surface water run-off. The impact is therefore considered to be positive.</p> <p>2. Appendix C specifically refers to the government requirement of incorporating permeable paving into any new areas of paving over 5 square metres. The Appendix also refers to design solutions such as green roofs. Both features will help absorb water and reduce risk of surface water run-off and pollution to water. Appendix C also cross references to SPD08 which provides more detailed guidance on this issue. The SPD should have a positive impact on this objective, in collaboration with other policy. The impact of the SPD on this objective is not considered to be any more significant than the impact of Option 1.</p>		
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.	<p>1. There are a range of existing policies that would be applied to any planning application for an extension, including those within the Local Plan such as policy SU2 Efficiency of development in the use of energy, water and materials. SPD08 Sustainable Building Design also sets standards for water consumption for new development, including extensions.</p> <p>2. Appendix C refers to SPD 08 Sustainable Building Design, which includes guidance and standards for minimising consumption of water. The SPD should have a positive impact on this objective, in collaboration with other policy. The impact of the SPD on this objective is not considered to be any more significant than the impact of Option 1.</p>	+	+
9. To promote the sustainable development of land affected by contamination.	There is no direct link to this objective.	0	0

Sustainability Objective	Summary	Option	
		1	2
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.	There is no direct link to this objective.	0	0
11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment.	There is no direct link to this objective.	0	0
12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors.	There is no direct link to this objective.	0	0
13. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap between those with the poorest health and the rest of the city.	1. Badly designed extensions can have adverse impacts on the amenity of neighbouring residents. In addition, living in a house that does not meet a household's needs can also have adverse impacts on the health and quality of life of the residents. There are a range of existing policies that would be applied to any planning application for an extension, including those within the Local Plan such as QD1, Design, QD14 Extensions and Alterations, and QD27 Protection of Amenity, as well as PAN 03 Affordable Housing and Lifetime Homes. These will guide development and ensure any development or extension meets certain criteria and	+	++

Sustainability Objective	Summary	Option	
		1	2
	<p>standards and will have a positive impact on this objective.</p> <p>2. The preliminary guidance section of the SPD outlines the potential negative impacts that extensions can have on the amenity of neighbouring residents, including noise, loss of daylight as well as visual impact. The impacts extensions can have on neighbouring properties and their residents are reinforced throughout the document. The preliminary guidance also advises residents to consider incorporating lifetime homes standards into their design and refers to PAN 03 Affordable Housing and Lifetime Homes. The SPD is considered to have a significant positive impact on this objective as should protect the amenity of neighbouring residents, as well as improve the quality of life of the residents themselves through ensuring their housing needs are met, and is considered to have a stronger positive impact than Option 1 as it also guides development that does not require planning permission.</p>		
14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.	<p>1. Local Plan policy QD7 only requires large scale developments (e.g. those over 1000sqm or 10 or more dwellings) to incorporate features to design out crime. This objective is therefore not relevant to the issue of extensions to single dwellings or to commercial buildings located within residential-type buildings.</p> <p>2. A former version of the SPD contained a section on designing out crime through incorporating Secured By Design principles. Although this section has been deleted from the final version, this is not considered to have any significant adverse impacts on this objective. A score of “no impact” is awarded against this objective, although the SA notes that this could be improved to a positive score if the original wording was reinstated.</p>	0	0
15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.	There is no direct link to this objective.	0	0

Sustainability Objective	Summary	Option	
		1	2
16. To engage local communities into the planning process	<p>1. Production of existing policies incorporated community consultation.</p> <p>2. Production of SPD will provide opportunity for community consultation.</p>	+	+
17. To make the best use of previously developed land.	There is no direct link to this objective.	0	0
18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings.	<p>1. There are a range of existing policies that would be applied to any planning application for an extension, including those within the Local Plan such as SU2 and SPD08 which would ensure energy efficiency is achieved.</p> <p>2. Although maximising sustainable energy use is not a key aim of the SPD, the preliminary guidance section outlines when the council will encourage the use of renewable energy and Appendix C provides more detail on Sustainable Building Design, with cross references to SPD08. Chapter 3 includes guidance on solar panels. The SPD, in collaboration with other policy, should have a positive impact on this objective, although the impact is not considered to be any more significant than Option 1.</p>	+	+
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.	<p>1. SPD08 Sustainable Building Design sets out various requirements in terms of ensuring development is adaptable to climate change.</p> <p>2. Appendix C specifically refers to the government requirement of incorporating permeable paving into any new areas of paving over 5 square metres. The Appendix also refers to design solutions such as green roofs. Both features will help in adaptation to climate change. The SPD, in collaboration with other policy, should have a positive impact on this objective. The impact is not considered to be any more significant than Option 1.</p>	+	+
20. To encourage new developments to meet the high level Code for Sustainable Homes / BREEAM "Excellent" standard.	<p>1. SPD08 sets out the requirements that new development, including extensions should meet.</p> <p>2. Appendix C refers to SPD 08 Sustainable Building Design which sets minimum standards for new development, including extensions. The SPD, in collaboration</p>	+	+

Sustainability Objective	Summary	Option	
		1	2
	with other policy, is therefore considered to have a positive impact on this objective.		
21. To promote and improve integrated transport links and accessibility to health services, education, jobs and food stores.	There is no direct link to this objective.	0	0
22. To reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, business and initiatives that promote these and other sustainability issues.	<p>1. There are a range of existing policies that would be applied to applications for extensions that would help reduce waste., including SU13 Minimisation and re-use of construction industry waste, Construction & Demolition Waste SPD as well as PAN 05: the storage and collection of recyclables and waste.</p> <p>2. The SPD encourages re-use and investment in existing stock, which could be viewed as indirectly helping to reduce waste and save resources. Appendix C refers to waste reduction and provides web-links on reducing waste and to PAN05: the storage and collection of recyclables and waste. The SPD, in collaboration with other policy, should have a positive impact on this objective.</p>	+	+

Summary

Option 1

This option is considered to have positive impacts on objectives relating to biodiversity, maintaining local distinctiveness, protecting the South Downs, meeting the need for housing, minimising risk of pollution to water, minimising water consumption, improving health, engaging local communities, maximising sustainable energy use, ensuring adaptability to climate change, meeting environmental standards and reducing waste. There are a range of existing policies contained within the Local Plan as well as Supplementary Planning Documents and other documents that provide policy guidance on these issues that would ensure the development of an extension avoids negative impacts and has positive impacts. However, it is noted that these policies will only apply to development that requires planning permission and are unlikely to be applied to any development that is considered to be Permitted Development.

Option 2

This option is also considered to have positive impacts on objectives relating to biodiversity, maintaining local distinctiveness, protecting the South Downs, meeting the need for housing, minimising risk of pollution to water, minimising water consumption, improving health, engaging local communities, maximising sustainable energy use, ensuring adaptability to climate change, meeting environmental standards and reducing waste. The adverse impacts that an extension can have on the property itself, on neighbouring properties, the streetscene and general environment, as well as on the amenity of neighbouring residents are strongly reinforced throughout the document leading to a significant positive impact on the objectives relating to maintaining local distinctiveness and improving health and are considered to be more positive than Option 1. As this option will also provide guidance for extensions that do not require planning permission, this also contributes to the significant positive impact.

Overall Summary

Although Option 1 is considered to bring about a range of positive impacts, Option 2 provides greater opportunity for positive impact, as the SPD provides guidance for extensions considered to be permitted development and therefore has a greater scope than existing policies. This is particularly the case with the objectives relating to maintaining local distinctiveness and improving health. The SPD should ensure that the quality of the built environment remains high, that the characteristics of all neighbourhoods, including Conservation Areas are maintained and that the health and quality of life of local communities are preserved.

Recommendations

The SA notes that the National Park Authority have the planning function for properties located within the SDNP and although this will apply to only a small number of properties located within Brighton & Hove, the SA suggests that the contact details for the NPA could be included in the Useful Contacts and References section of the SPD.

The SA notes that the score against objective 14: “integrating health and community safety considerations into city urban planning and design processes and project” could be improved from a score of “no impact” to a “positive” score if the wording that referred to Secured By Design principles was reinstated in the SPD.