

## **Appendix 3, City Plan: Background Studies Report**

### **Summary of Background Studies**

#### **1. Affordable Housing Viability Study Update (April 2012)**

This Study updates the previous Affordable Housing Development Viability Study work undertaken in 2004 and updated in 2007.

Within the overall requirement for housing across the City, the demand for affordable housing is a major issue. The study re-assesses the (financial) capacity of residential development in the City to deliver affordable housing without viability being unduly affected based on an updated review of circumstances and therefore assumptions used within the assessment.

The study's main recommendations are for:

- City-wide affordable housing policies (not varied by geography) – although the report provides alternative options for consideration.
- 40% on-site affordable housing on sites of 15+ units followed by a sliding scale of affordable housing requirements below this.
- 30% on-site affordable housing on sites of 10-14 units.
- 20% affordable housing equivalent contribution on sites of 5-9 units.
- No more than 10% affordable housing equivalent contribution on sites of fewer than 5 units to maintain the sliding scale principles and due to viability difficulties that can arise on the smallest sites.

#### **2. Housing Requirements Study – Supplementary Papers (Brighton & Hove)(March 2012)**

The Supplementary Papers were prepared by consultant GL Hearn. The first paper considers the demographic implications of the proposed housing trajectory in City Plan. The Paper draws on preferred options Housing Targets Paper and 2011 Strategic Housing Land Availability Assessment Update. The paper indicates that planned housing delivery could support an 11% growth in numbers of households and a 10% growth in the workforce.

The second paper also considers the implications of demographic change on demand for homes in Brighton & Hove. It provides an analysis of requirements for different sizes and types of homes in Brighton & Hove based on demographic modelling. The Paper supplements and updates the analysis within the 2008 Strategic Housing Market Assessment (SHMA). It also indicates an estimated 53% of overall housing need and housing demand (market and affordable) is for 3-4 bedroom properties. Overall requirement for flatted development makes up around a third of the total. Ability to deliver this

mix will be restricted by the types of sites likely to be brought forward for development.

### **3. Viability Testing – Strategic Sites (2011)**

The purpose of the Assessment was to look at the financial viability of a number of strategic site allocations that were contained within the Submitted Core Strategy to ensure that the allocations that go into the City Plan will be viable and deliverable during the life of the City Plan. The following sites were assessed:

- Brighton Marina Inner Harbour (DA2 Brighton Marina, Gas Works and Black Rock Area)
- Preston Barracks (DA3 Lewes Road)
- Preston Road – Site 1 – Anston House and Telecom House DA4 New England Quarter and London Road Area)
- Preston Road – Site 2 – 149 -163 Preston Rd (DA4 New England Quarter and London Road Area)
- New England Quarter Sites – Longley Industrial Estate, Richardson’s Scrapyard and Brewers Paint Merchants DA4 New England Quarter and London Road)
- Edward Street Quarter (DA5 Eastern Road and Edward Street Area)

The Assessment looked at whether these site allocations were viable in the current market conditions or have a reasonable prospect of becoming viable in the longer term. The viability assessments have been undertaken independently by Cluttons (property consultants and estate agents) which have been reviewed and explained in the covering report.

The findings and recommendations arising from each viability assessment have informed the strategic allocations within the draft City Plan Development Area policies in terms of the type, mix and amount of development on each site. The findings indicate that amendments should be made to the strategic allocations to ensure development is deliverable.

### **4. Appropriate Assessment (2012)**

The Appropriate Assessment was conducted and written by the Brighton & Hove City Council’s Ecologist. The aim of the assessment is to evaluate the ecological impact of the policies of the proposed City Plan Part 1 to ensure that it does not have an adverse effect on any European or Ramsar wildlife sites in particular the Castle Hill Special Area of Conservation and a number of other European or Ramsar wildlife sites located in the wider areas. The Appropriate Assessment was first undertaken in 2009 to support the Core Strategy. The 2012 update takes account of the proposed revocation of the South East Plan, the publication of the National Planning Policy Framework and revisions made to the Development Areas identified in the City Plan Part 1 (formerly the Core Strategy).

The draft Appropriate Assessment concludes that the proposals in the Proposed Submission City Plan Part 1 DPD will not have an adverse effect on any European or Ramsar wildlife sites. Any subsequent plan following the City Plan Part 1 will similarly need to adhere to the requirements of the Habitat Regulations.

There are therefore considered to be no requirements to go beyond the scoping stage as no impacts have been identified. This draft Appropriate Assessment will be sent to Natural England for comment.

## **5. Sequential and Exceptions Test (2012)**

The purpose of the document is to set out the Sequential Test, and Exception Tests where appropriate, regarding flood risk for the eight Development Areas identified in the City Plan, following the steps outlined in the National Planning Policy Framework and technical guidance. The Sequential and Exceptions Tests were first undertaken in 2009 to support the Core Strategy. The 2012 update takes account of the proposed revocation of the South East Plan, an updated Strategic Flood Risk Assessment, the publication of the National Planning Policy Framework and revisions made to the Development Areas identified in the City Plan Part 1 (formerly the Core Strategy).

The Sequential Test aims to ensure that new development is 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.

All the proposed Development Areas have passed the Sequential Test as it is not considered that those located in flood risk areas could be reasonably located in areas of lower flood risk. For Development Areas that are partly in flood risk zones, the more vulnerable land uses, such as residential development, should be directed to the parts of the Areas that are at lower risk of flooding.

The Exception Test has 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 Flood Risk Assessments 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 concluded that it is appropriate to allocate both sites in the City Plan.

