

Appendix 4 - City Plan: Summary of New / Updated Background Studies

1. Assessment of Housing Development Needs Sussex Coast Housing Market Area, GL Hearn 2014

This study provides an updated assessment of housing development needs in the Sussex Coast Housing Market Area (HMA) in response to revised demographic data published by the Office of National Statistics. National Planning Policy Guidance requires local authorities to take account of new demographic information in order to ensure that the council's objectively assessed housing needs are based on the most up to date information. The study updates the previous Housing Duty to Co-operate Study, Sussex Coast HMA May 2013 and provides a robust background document to support the City Plan.

The 2014 Assessment takes account of the following information:

- ONS updates regarding net migration
- ONS updates on household formation rates

The report suggests that the most realistic projection of future (unconstrained) housing requirements for the city indicates a requirement for an additional 18,000 – 24,000 dwellings over the 2010 – 2030 plan period (equivalent to 800 -1000 homes per annum).

2. Duty to Cooperate Statement Update, September 2014

The City Council published a Duty to Cooperate Compliance Statement to accompany the Submission version of the City Plan Part 1 in summer 2013. This detailed the measures which had been taken to comply with the Duty to Cooperate up to the point of submission.

The examination hearings took place in October 2013, and the Inspector issued a letter to the City Council in December 2013 detailing her initial conclusions on a number of soundness issues. In her letter, the Inspector stated that “the Council has sought to engage positively with neighbouring authorities in the region” and stated that her initial conclusion was that the legal requirement of the Duty under Section 33a of the Planning and Compulsory Purchase Act 2004 had been met.

It is at the point of submission that the legal requirement needs to be met in judging whether a plan submitted for examination has met the requirements of the Duty. Given the time that has elapsed since the City Plan was first submitted the paper has been updated to demonstrate the positive progress made on Duty to Cooperate. It outlines the continued cross-boundary work undertaken by the City Council with adjoining authorities.

The most significant advances since the publication of the first document have been the agreement of the Greater Brighton City Deal with Government followed by the establishment of the Greater Brighton Economic Board. The adoption of the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area which will be subject to update and review. In addition there have been a number of meetings and discussions with other local authorities in the context of Duty to Cooperate and the development of their Local Plans.

3. Transport Assessment Update, JMP Consultants (2014)

JMP Consultants was commissioned by the city council to update the May 2013 Strategic Transport Assessment (TA) of the City Plan Part 1 to take account the identification of the urban fringe as broad source of potential for housing development and the increased windfall allowance.

The STA Update has documented the additional transport impacts arising from the City Plan main modifications in terms of the increased housing target. The key objectives have been to:

- determine the transport impacts of the development strategy detailed in the updated 2030 City Plan including potential highway and public transport impacts and associated constraints on travel; and
- determine the level of interventions (mitigation) required to manage traffic and transport in order to support sustainable development and the City Plan.

Specifically this report has sought to determine whether the mitigation previously proposed for 11,300 dwellings; also satisfactorily mitigates the additional 1,900 dwellings identified in Brighton & Hove mainly on the urban fringe.

To establish the impacts of the updated City Plan the following forecast year scenarios have been re-run:

- 2030 City Plan Reference Case – Base model plus committed developments and transport schemes that are certain or near certain of being delivered in the plan period plus the strategic developments noted in the proposed City Plan (Development Areas 1 to 8) and Urban Fringe sites.
- 2030 City Plan Mitigation Case – This is the 2030 City Plan Reference Case plus the additional mitigation measures identified in the May 2013 STA and required to address travel constraints.

The assessment of these scenarios has been conducted for a morning and evening weekday peak period and has revealed the following at a strategic level:-

- The proposals within the updated City Plan Mitigation show an increase in both car trips and public transport trips. This is to be expected given 20 years of growth on the network from committed developments and background traffic growth.

- The overall public transport modal split for the city is lower with the urban fringe sites because these have lower levels of public transport accessibility than the development areas already tested
- Without further public transport interventions, the modal split from the new urban fringe sites is likely to be more car dominated than for the development areas which were tested in the 2013 May STA.
- There is a higher modal share by public transport with and without the additional 1,900 dwellings than in the 2010 base.
- In the evening peak, the mitigation measures already identified in the May 2013 STA will be sufficient to return the operation of the network to slightly better than if the developments were not there. In the morning peak, the model is forecasting a slight deterioration of around 8%.

The results of the modelling show that a sustained improvement in public transport provision and walking and cycling facilities accompanied by personalised travel planning and behaviour change campaigns will be required to ensure that developments in the urban fringe offer a realistic travel choice. This is in addition to the mitigation already identified in the May 2013 STA.

Given the location of these sites, bus based solutions are likely to be required and the update identifies some potential measures which might be considered at the detailed planning application stage as developments come forward. In particular opportunities should be explored to link some of the public transport interventions at Toads Hole Valley with those in neighbouring development areas such as Hangleton and Mile Oak.

At a local level, increases in traffic and journey times are forecast around the northern part of Brighton & Hove and in particular where it interfaces with the Highways Agency's Strategic Road Network. The City Plan mitigation previously developed in conjunction with the Highways Agency has been tested further and this indicates that the conclusions drawn for the May 2013 STA are still valid. That is, a package of junction improvements has been identified and discussed with the HA which would enable traffic to more efficiently leave the A27, with no detrimental impact on the safety and efficiency of the mainline carriageway.

4. 2014 SHLAA Update (September 2014)

The Strategic Housing Land Availability Assessment (SHLAA) is updated annually to take account of the latest annual residential monitoring exercise and any further technical work regarding development site capacity and viability.

The SHLAA site and summary schedules illustrate actual and anticipated residential development over the City Plan timescales 2010 – 2030. The schedules also illustrate what is expected to be delivered spatially across the city in terms of the eight Development Areas (DA1 – DA8) indicated in the City

Plan Part one across the Rest of the City. The 2014 SHLAA Update has also taken account the findings of the 2014 Urban Fringe Assessment Study and the identification of the Urban Fringe as broad source of potential for housing.

The 2014 SHLAA Update indicates there is potential capacity for around 13,200 dwellings to be delivered over the plan period. An updated 'housing trajectory' indicates the rate at which residential development is anticipated to come forward over the plan. This has informed the Housing Implementation Strategy (Annexe 3 to the City Plan Part 1). A final version of the SHLAA has been produced in September following consultation with landowners.

5. Sustainability Appraisal

The aim of the City Plan is to deliver sustainable development of the city in accessible locations and to help create cohesive and sustainable communities. The Sustainability Appraisal tests the extent to which the City Plan meets identified sustainable development principles. This is a separate independent document produced alongside the City Plan, which critically examines its objectives, options and policies and tests them against the principles of sustainable development.

One of the tasks of the SA is to ensure that all reasonable alternatives have been evaluated. The SA has therefore tested the implications of the revised Spatial Strategy against the alternative option of Spatial Strategy as set out in the Submission City Plan Part 1 (2013). It has also tested the implications of the housing target set out in the proposed modification to CP1 Housing Delivery against an alternative option of meeting the full objectively assessed need for housing.

The SA report provides an overview of what the anticipated impacts of implementing the Plan will be. The SA has therefore carried out a re-assessment of all policies whereby the Proposed Modification resulted in a significant change to the previous SA findings. As a result, the SA has led to a series of minor amendments to the Proposed Modifications to the City Plan.

Overall, the SA of the proposed modifications comes to the conclusions that the Plan will make an important contribution to achieving sustainable development in the city and that it balances the competing development needs of the city in a way that protects the majority of the natural environment and the historic built environment. Where there is potential for adverse impacts, the SA considers that the policies contained within the Plan should ensure any impacts are minimised and mitigated to an acceptable level.

6. Appropriate Assessment June 2014 Updated Report (Habitats Regulations Assessment Report)

This updated assessment takes account of the increased housing target and the identification of the urban fringe as a broad source of potential for housing. The aim of the assessment is to evaluate the ecological impact of the

proposed modifications to the City Plan Part 1 to ensure that it does not have an adverse effect on any European or Ramsar wildlife sites.

The updated Report concluded that from the information available at the proposed modifications stage, all the possible impacts of the proposed modifications to the Brighton & Hove City Plan Part 1 on European sites had been discounted at the screening stage of the Appropriate Assessment. It therefore concluded that no further change to the City Plan Part 1 was required. In addition, it concluded that the City Plan Part 1 did not support any project proposal that would have an adverse effect on the integrity of any European or Ramsar site.

7. Health Equalities Impact Assessment (HEQIA) Addendum

The aim of the Health & Equalities Impact Assessment is to identify potential health and equalities outcomes, both adverse and beneficial, and their distribution amongst sensitive community groups. The proposed modifications to the City Plan Part 1 have been appraised against a framework consisting of the key determinants of health and the potential health outcome upon sensitive community groups identified in order to address current and prevent future adverse health and equality outcomes.

The Assessment concluded that the majority of the proposed main modifications to have no impact or to strengthen the potential for beneficial impacts against a range of health determinants. In the cases where the HEQIA predicted an adverse impact, the HEQIA considered the requirements of Policy CP18: A Healthy City to address the concerns. The HEQIA made some individual recommendations for changes to proposed modifications policies in order to strengthen the requirements of CP18. These have been made to either prevent or reduce the potential for an adverse health or equalities outcome.

Overall, the HEQIA concluded that the City Plan, as modified, presents policies that are co-ordinated to address health and well-being outcomes throughout the city.

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

The National Planning Policy Framework (NPPF) 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' (NPPF, paragraph 100).

This further update in June 2014 takes into account the inclusion of the urban fringe as a broad source of housing potential with an identified potential of

1,060 homes informed by the Urban Fringe Assessment Study 2014 and an increased windfall allowance. The urban fringe allowance is in addition to the identification of Toads Hole Valley as a Development Area in the Submission City Plan Part 1 (DA7 Toads Hole Valley). The 2012 update applied the sequential test to Development Area 8 - Toads Hole Valley. Whilst the urban fringe is identified as a broad source of potential for housing through the proposed changes to the City Plan Part 1, no specific sites are allocated through the proposed modifications to the City Plan Part 1. The Sequential Test cannot therefore be applied to this identified allowance. The document has been updated to reflect the proposed changes to the Plan and the current stage of the Examination.

9. Addendum to Annexe 2 to the City Plan Part 1 - Infrastructure Delivery Plan, June 2014

The addendum report has been produced in response to the increase in the housing target proposed in the Main Modifications to policy CP1 in part One of the City Plan. The document comprises an assessment of impacts and changes affecting infrastructure and identifies key requirements to support the potential delivery of future development in areas identified in the Urban Fringe Assessment. The update is based upon information available at the time it was prepared and more detailed assessment will be undertaken at regular intervals.

The provision for certain physical and community infrastructure to support future needs arising from an increased housing target has been identified across the following areas and is further detailed in the addendum:

Water, Wastewater treatment and sewerage connectivity

No major issues were identified. As the sites are mostly at the end of the supply and drainage network some locally significant improvements particularly in regard to connectivity to sewage networks in the west of the city would be needed. More locally other improvements may be required and impacts would be modelled once there is more certainty on proposals. This requirement is already addressed by proposed main modifications to policy CP7.

Education

There are ongoing needs for additional school places particularly in the west and centre of the city. This will be addressed by seeking opportunities for new schools as part of major development schemes in priority areas of the city. Overall planning obligations will be secured from new residential development to contribute funding towards expanding both primary and secondary education provision to mitigate impacts. There remains an existing need for an additional secondary school to meet the needs of a growing population.

Transport

The findings of the Transport Assessment Update, also undertaken in response to the main modifications, indicate that there will no requirements for

additional major infrastructure to mitigate impacts resulting from the increased housing target. However, there will be the need for general mitigation arising from development proposals on a site by site basis, for example, improved bus services upgraded bus stops. Cycling improvements could also be considered more specifically to links and upgrade to the network. Some requirements may be secured through developer contributions.

Health provision

There are localised capacity issues in both the west and east of the city. Consideration will be given to providing health facilities within new major developments.

10. Combined Policy Viability Study, September 2014

This study provides an update on the Combined Policy Viability Study (CPVS) produced by BNP Paribas Real Estate in September 2013 on behalf of the City Council. This study tests the ability of a range of development types throughout the 'City Council's area to viably meet the modified emerging planning policy requirements of the Brighton & Hove City Plan Part One, alongside the adopted policies identified as not being superseded in the Brighton & Hove Local Plan (July 2005), Supplementary Planning Guidance / Documents and other pertinent local guidance as well as national policies. The study tests the cumulative impact of the City Council's requirements, in line with the requirements of the National Planning Policy Framework ('NPPF') and the Local Housing Delivery Group guidance '*Viability Testing Local Plans: Advice for planning practitioners*' (June 2012).

Key findings

The key findings of the study are as follows:

- The results of this study are reflective of current market conditions, which have been updated since the previous study published in September 2013. This update study has identified that the property market in Brighton and Hove has for the most part, particularly prime office space and residential, improved over the last 12 months and the outlook is identified as being likely to further improve over the medium term.
- Some development typologies tested were unviable in certain circumstances due to market factors, rather than the impact of the City Council's proposed policy requirements and standards. These schemes are identified in the appraisals as being unviable at 0% affordable housing and base build costs and are generally flatted developments located in market areas 5, 6 and 7. These schemes will not come forward until changes in market conditions i.e. an improvement in sales values by comparison to build costs. In this regard their current unviable status should not be taken as an indication that the City Council's requirements cannot be accommodated.

- In most cases schemes can accommodate the City Council's affordable housing requirement (Policy CP 20: Affordable Housing) at a level between 10% to 40% (without grant) and between 20%-40% in the higher value areas.
- When the cumulative effect of affordable housing and Section 106 is tested on developments, some schemes are able to accommodate less affordable housing in certain scenarios. It is noted however, that the Council's flexible approach to seeking only the essential Section 106 contributions towards infrastructure, particularly in the current economic climate (shown by the recessionary measures Section 106 appraisals) assists with both development viability and ensuring the provision of the most vital infrastructure.
- The study highlights that a flexible approach to costs affecting commercial developments, particularly where there is a large requirement for the provision of such space outside the prime City Centre location is essential, as at current costs and values such developments are identified as being largely unviable. However, we note that policy requirements relating to commercial floorspace are applied flexibly across the City, as recognised by the Council's flexible approach to the application of sustainability requirements (BREEAM) in policy CP8: Sustainable Buildings, which although sets target for attaining higher levels of sustainability is subject to viability and feasibility.
- Notwithstanding this, it should be noted that the results of this viability exercise, which identify certain commercial development as not viable, do not mean that sites will not be developed within the City for these uses. Viability is only one of many factors which affect whether a site is developed, for example, with regard to owner occupiers who may wish to locate in Brighton & Hove. Alternatively, an existing occupier looking to re-locate may wish to develop their own premises by reference to their own cost benefit analysis, which will bear little relationship to the residual land value calculations that a speculative landlord developer may undertake.
- The City Council's modified sustainability requirements for residential developments set out in Policy CP8 reduces the Code for Sustainable Homes (CSH) target from level 5 to 4 increasing to level 5 after 2016. The City Council's flexible approach to sustainability requirements, including the consideration of allowable solutions is identified by the results of this study as being important to deliver viable development. This is particularly the case in the lower value areas of the City and on higher density schemes where the build costs incurred are higher.
- The results of our appraisals suggest that achieving zero carbon by adopting allowable solutions in accordance with government requirements will be achievable on many sites in the City. This is still likely to be ambitious in the lower value areas (Areas 5-7) and on higher density schemes that will be helped by a reduction in costs in comparison to today's estimates and/or a growth in sales values by comparison to base

build costs. We note that costs associated with delivering sustainable development have been demonstrated to have reduced over the last few years and following future research into the technology to deliver higher levels of sustainability are expected to reduce further. This position is clearly demonstrated by the 2013 update work undertaken on such costs by Element Energy and David Langdon and previous studies undertaken on behalf of the CLG¹.

- This update study has identified that viability has generally improved in the City over the last 12 months. Notwithstanding this position, the results of this study demonstrate that the City Council's flexible approach to applying its sustainability, affordable housing and Section 106 contributions requirements, will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for landowners and developers to achieve competitive returns, as required by the NPPF.

11. Housing Implementation Strategy – Annexe 3 to the City Plan Part 1, September 2014

The updated Housing Implementation Strategy indicates that through the proposed modifications the City Plan Part One will make sufficient provision to meet the planned housing target of 13,200 additional homes in the plan period to 2030. Housing delivery from small sites will also continue to make a significant and ongoing contribution to supply throughout the plan period. Further windfall housing delivery is also anticipated through the temporary change of permitted development rights to allow changes of use from office to residential.

The Housing Implementation Strategy sets out the options for managing housing land delivery over the plan period. The expected rate of housing delivery over the Plan period is illustrated through an updated 'housing trajectory' and the Housing Implementation Strategy sets out the council's preferred approach to identifying a 5 year supply of housing sites.

The updated housing delivery trajectory reflects the following key factors:

- The effects of economic recession which have particularly impacted upon housing delivery rates in the early years of the plan period and are continuing to constrain the recovery of the housing market within the city; although there are signs of an improvement. This has resulted in a significant 'shortfall' against planned housing requirements.
- The particular impact the recession has had on the ability to bring forward some of the larger, more complex development sites within the city; many of which are large scale flatted types of development; some of which are mixed use development schemes; that require significant investment and longer lead in and build out times.

- The loss of a number of identified general housing sites to student housing proposals for which there is a strong current demand; and
- A revised assessment of annual outputs on identified housing sites, again reflecting impacts of economic recession and flatted formats of development in the city.

In summary, the following key points are relevant:

- The planned housing target of 13,200 (implied average of 660 units per annum) for the plan period represents a significant boost in housing supply in accordance with the general thrust of policy in the NPPF.
- This planned boost to housing supply is particularly evident when compared to historic development trends in the city, e.g. the average rate of housing delivery over the last 20 years has been 590 units; in the last 15 years 540 dwellings per annum and in the last five years 350 dwellings per annum.
- The City Plan also seeks to boost housing supply in the first five years post adoption; the supply requirement implies an average of 650 units per annum compared to an average of just 350 units delivered over the last 5 years.
- Given the impacts of economic recession and particularly the impacts on housing delivery in the early years of the plan period, achieving the planned delivery of housing over the full plan period will be challenging. However, the council is actively addressing this through a series of positive actions and measures to ensure housing delivery is achieved in accordance with the anticipated housing trajectory.

12. Urban Fringe Assessment Study, Land Use Consultants, June 2014

Land Use Consultants were appointed by the council to undertake an assessment of the city's urban fringe sites to identify the potential contribution from the urban fringe towards the city's housing requirements.

66 urban fringe sites/parcels of land have been assessed, by means of site visits and a detailed desk-based analysis of constraints. These sites are listed and mapped at the end of Appendix 4. The assessment examines the potential positive and negative effects of residential development and estimates indicative numbers of dwellings that each site could reasonably accommodate.

The 2014 Urban Fringe Assessment is a detailed investigation, for each site, of whether and to what extent identified constraints (e.g. open space, ecology, landscape, environment and archaeology) could be satisfactorily mitigated as part of any potential residential development. This specifically was to address the City Plan Inspector's concerns with the council's previous urban fringe assessment.

The assessment therefore focuses on a detailed consideration of the potential impacts of residential development (either positive or negative or a combination) on a pre and post mitigation basis with reference to identified constraints.

The study:

- identifies 39 individual sites/land parcels are identified as having some potential; covering 31 hectares which equates to approximately 7.5% of the total urban fringe area.
- estimates that 1,180 homes could potentially be accommodated on these sites.
- generally only identifies small parts of sites (the least sensitive areas) for housing.
- identifies certain '**clusters**' of sites which should be taken forward through a '**masterplan**' approach to development to avoid piecemeal approach.
- recommends that improvements, in terms of new public open space and new community facilities could be secured alongside new development.
- recommends that four sites should be considered for a Local Green Space status (the same protective status as Green Belt).
- excludes 5 sites from the detailed analysis because the majority of the site was affected by an 'absolute constraint'. Absolute constraints included national designations such as Scheduled Ancient Monuments, Sites of Special Scientific Interest and also included cemeteries and graveyards and reservoirs.

The South Downs National Park Authority and the County Archaeologist were consulted on the Urban Fringe Assessment along with a steering group of council officers representing parks and property services.








Urban Fringe Assessment – Map index - Site References and Description

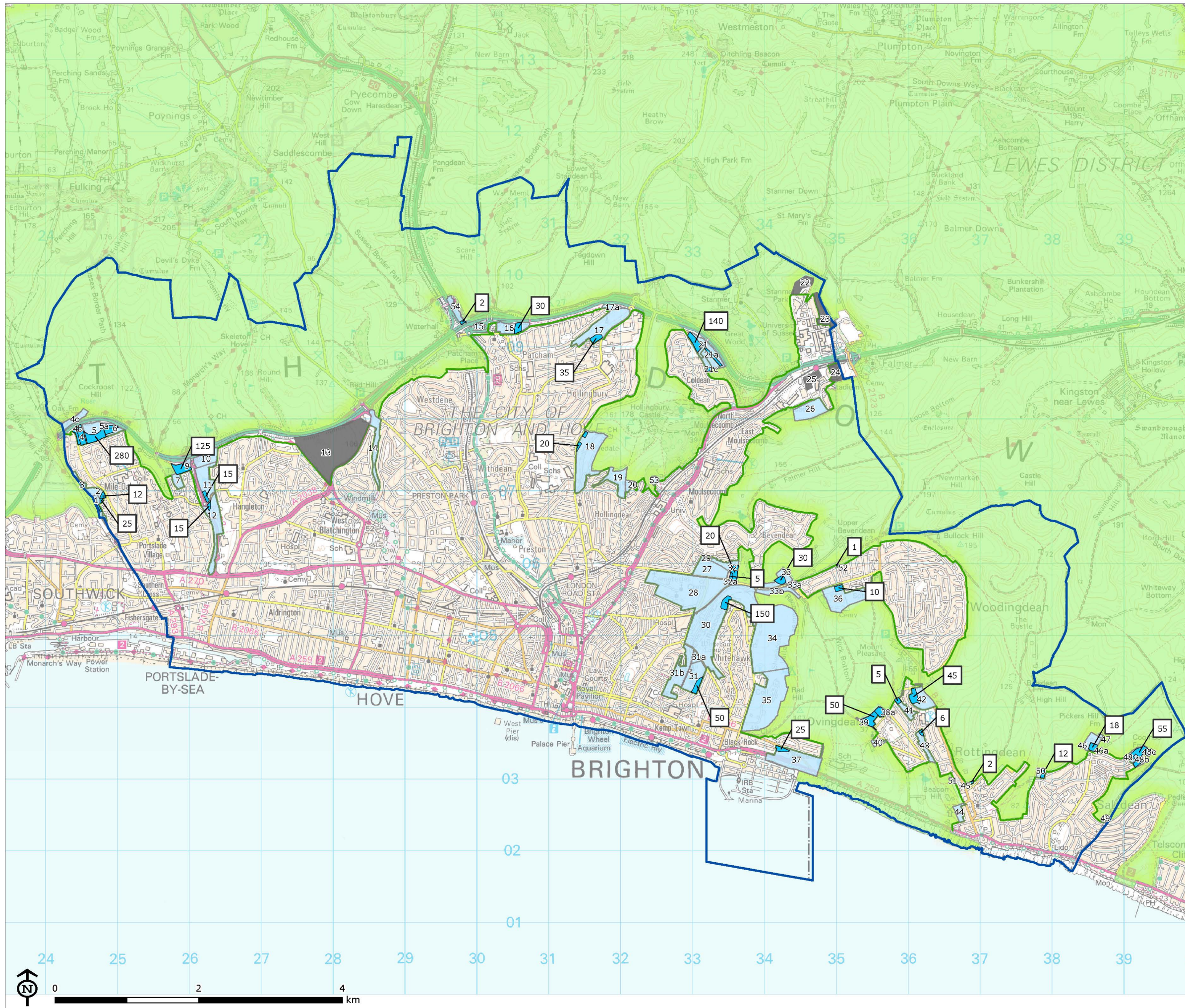
Site Reference No.	Site Description
1	Land at Oakdene, Southwick Hill
2	West of Mile Oak Road, Portslade
3	Oakdene, Upper Paddocks, South Wick Hill
4	Land at Mile Oak Road, Portslade
4a	Land at Mile Oak Road, Portslade
4b	Land at Mile Oak Road, Portslade
4c	Land at Mile Oak Road, Portslade (north of A27)
5	Land at Mile Oak Hill, Portslade
5a	Land at Mile Oak Hill, Portslade
6	Land at Mile Oak allotments, Portslade
7	Foredown Allotments, Thornbush Crescent Portslade
no site 8	
9	Land at Hangleton Bottom, Portslade
10	Benfield Hill, Benfield Valley
11	Benfield Valley, north of Hangleton Lane.
12	Benfield Valley, south of Hangleton Lane
14	Three Cornered Copse, bounded by Dyke Road Ave, King VI Ave.
15	A27/A23 Interchange (including land east of Patcham Court Farm)
16	Land at and adjoining Horsdean Recreation Ground, Patcham
17	Land at Ladies Mile, Carden Avenue
17a	Mackie Avenue
18	Land south of Hollingbury Golf Course and east of Ditchling Road (including land north or reservoir, Roedale allotments and Hollingbury Park)
19	Lower Roedale Allotments and Playing Fields, Lynchett Close.
20	Hertford School Grounds, Lynchett Close.
21	Land to North East of Coldean Lane.
21a	Land North of Varley Halls, Coldean Lane.
21b	Varley Halls, Coldean Lane
21c	Land South of Varley Halls
26	Brighton University Playing Fields
27	City and Jewish Cemeteries
28	Brighton Cemeteries, Tenantry Down Allotments and adjoining land

Site Reference No.	Site Description
29	Jewish Cemetery and land adjoining
30	Land at and adjoining Brighton Race Course
31	Land east of Whitehawk Road
31a	Whitehawk Hill Road/Manor Hill Road
31b	Land west of Whitehawk Hill Road
32	Land at South Downs Riding School
32a	Reservoir Site
33	Land North of Warren Road (Ingleside Stables)
33a	Land East of Warren Road
33b	Land South of Warren Road
34	Sheepcote Valley, Wilson Avenue.
35	East Brighton Park and Sports Ground
36	Land south of Warren Road, adjacent to Nuffield Hospital (included mixed open spaces and Lawns Memorial burial grounds)
37	Roedean Miniature Golf Course and land south of A259
38	Land at Ovingdean Hall Farm (land north of Bulstrode Farm)
38a	Land at Ovingdean Hall Farm
39	Land at Bulstrode Farm / Ovingdean Farm (includes former chicken sheds)
40	Land east of Greenways
41	Land at Wanderdown Road Open Space
42	Land adjacent to Ovingdean and Falmer Road, Ovingdean
43	Land to rear of Longhill Road
44	Allotments to west of The Green
45	Land to Rear of Bazehill Road
46	Land west of Saltdean Vale, Saltdean
46a	Land at Former Nursery site west of Saltdean Vale, Saltdean
47	Land and buildings at Pickershill, Saltdean Vale
48	Land at Coombe Farm Westfield Avenue
48a	Land north of Westfield Rise
48b	Land at Westfield Avenue North
48c	Land at Saltdean Boarding Kennels
49	Covered Reservoir – Longridge Avenue
50	Land West of Falmer Avenue
51	Rottingdean Recreation Ground
52	Rosebery Avenue, Woodingdean
53	Queensdown School
54	Land at Braypool Lane

Brighton and Hove Urban Fringe Assessment

Urban Fringe Site Assessment (2014)

-  Number of units
-  UA boundary
-  Urban fringe with potential
-  Urban fringe sites
-  Previous urban fringe sites
-  Built-up area boundary
-  National park boundary



Map Scale @ A3:1:52,000

