

Hove Station Neighbourhood Plan

Strategic Environmental Assessment
Regulation 14 Environmental Report

November 2018

Quality information

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Non-Technical Summary

What is strategic environmental assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Hove Station Neighbourhood Plan. This process is required by the SEA Regulations, which transpose the European Commission SEA Directive into UK law.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Hove Station Neighbourhood Plan

The Neighbourhood Plan area covers the Hove Station area including part of the DA6 Hove Station area which relates to Policy DA6 in the Brighton & Hove City Council Local Plan. Prepared to be in conformity with the Brighton and Hove City Plan, it sets out a vision and a range of policies for the Neighbourhood Plan Area. These relate to a range of topics, including, but not limited to, landscape and townscape character, the quality of life of residents, tourism and the protection and enhancement of the environment.

It is currently anticipated that the Neighbourhood Plan will be submitted to Brighton & Hove Council in 2019.

This Environmental Report, which accompanies the current consultation on the Neighbourhood Plan, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (October 2017), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Neighbourhood Plan;
- The likely significant environmental effects of the Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Neighbourhood Plan; and
- The next steps for the Neighbourhood Plan and accompanying SEA process.

Assessment of alternative approaches for the Hove Station Neighbourhood Plan

Emerging evidence suggests that there is the opportunity to deliver significantly more housing and employment growth within the Hove Station development area (DA6) than envisaged through the adopted City Plan in Policy DA6, which proposes a minimum level of employment and housing growth subject to a number of criteria.

The adopted City Plan recognises that while the Hove Station development area (DA6) offers a significant opportunity for regeneration, there are also a number of constraints that need to be a factor in decision-making. These include a declared Air Quality Management Area, which falls partially within the Neighbourhood Plan Area and development area DA6, as well as several junctions in the area being near or at capacity. There is also a significant number of designated and non-designated heritage assets within and surrounding the Neighbourhood Plan Area.

Taking the above into account, it was considered appropriate for the SEA to focus on the overall level of growth to be delivered within the Hove Station area during the life of the Neighbourhood Plan. In particular, there is a need to consider the relative merits of a lower level of growth closer to the minimum proposed in the adopted City Plan compared to the higher level of growth being proposed by developers. As a result two options were identified for detailed assessment through the SEA. These were:

- **Option 1:** Lower level of growth in line with the minimum targets set out in Policy DA6 of the adopted City Plan (i.e. delivery of 525 residential units, retention/replacement of 13,000 sqm of employment floorspace).
- **Option 2:** Higher level of growth in line with emerging evidence (i.e. delivery of 1,233 to 1,333 residential units and retention/replacement of 23,800 sqm of employment floorspace).

These two options were appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). They were considered through the SEA Framework of objectives and assessment questions developed during scoping and the two options have been ranked in terms of their sustainability performance against the relevant SEA Theme.

The detailed findings of the appraisal are presented in **Table 4.1** in the main body of the Environmental Report. The assessment found that Option 2 is more likely to result in long term significant positive effects as it provides an opportunity to regenerate large areas of previously developed land within the Neighbourhood Plan area and deliver significant benefits to the local community, which includes new homes and employment opportunities as well as improvements to sustainable transport modes and the public realm.

Option 2 was progressed as the preferred approach by the Hove Station Neighbourhood Forum as it is in line with the aspirations and policies set out in the adopted City Plan and reflects emerging evidence.

Assessment of the current version of the Hove Station Neighbourhood Plan

The current consultation version of the Neighbourhood Plan presents planning policies for guiding development in Neighbourhood Plan Area. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA topics:

- Air Quality
- Climate change;
- Landscape and historic environment;
- Land, soil and water resources;
- Population and community;
- Health and wellbeing; and
- Transportation.

The assessment found that the current version of the HSNP is likely to lead to long term positive effects, across the majority of SEA topics assessed. The HSNP supports proposals that are coming forward through the development management process for the regeneration of previously developed land. These proposals along with a Concept Masterplan and Options Study (2017) demonstrate that there is the opportunity for significant brownfield regeneration within the Neighbourhood Plan area, in particular development area DA6 proposed through the adopted City Plan. This has the potential to deliver a significant number of new homes and employment opportunities along with improvements to the public realm and sustainable transport modes, with significant long term positive effects for a number of SEA themes.

There are uncertainties around the nature and significance of effects on transport and air quality given the lack of evidence relating to impacts on traffic. However, the assessment concluded that residual effects are still likely to be positive given the opportunity to regenerate the area and promote Hove Station as a sustainable transport hub for the city. This along with the delivery of significant homes and employment opportunities could help to reduce commuting by private vehicle. It is considered that this has the potential for a long term positive effect on transport and therefore indirect positive effects for air quality and climate change. It will be important for any proposal coming forward to demonstrate how they will minimise impacts on traffic and improve sustainable transport modes.

Policies within the adopted City Plan and the HSNP should ensure that development coming forward is sensitively designed and that building heights are limited so that there are no residual negative effects on the historic environment.

Recommendations at this current stage

A number of recommendations have been made for improving the sustainability performance of the current version of the HSNP. These are summarised as follows:

- To ensure that the historic environment is adequately considered as part of any development management process it is recommended that Policy 15 is strengthened by including a need for development to contribute towards the conservation and enhancement of historic environment features.
- It is recommended that the relevant Conservation Area Appraisals are referenced within the HSNP.
- It is recommended that Policy 10 is strengthened further through alignment with, and direct reference to, the Brighton and Hove Green Infrastructure Network Study.¹

Next steps

This Non-Technical Summary and Environmental Report accompanies the Pre-Submission version of the Hove Station Neighbourhood Plan for consultation.

Following consultation, any representations made will be considered by the Hove Station Neighbourhood Forum, and the Non-Technical Summary and Environmental Report will be updated as necessary. The updated Non-Technical Summary and Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Brighton & Hove City Council, for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Brighton & Hove City Plan.

If the subsequent Independent Examination is favourable, the Hove Station Neighbourhood Plan will be subject to a referendum, organised by Brighton & Hove City Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Hove Station Neighbourhood Plan will become part of the Development Plan for Brighton & Hove City, covering the defined Neighbourhood Plan area.

¹ Brighton and Hove Council (2009) Green Infrastructure Network Study [online] available at: <http://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one-background-studies>

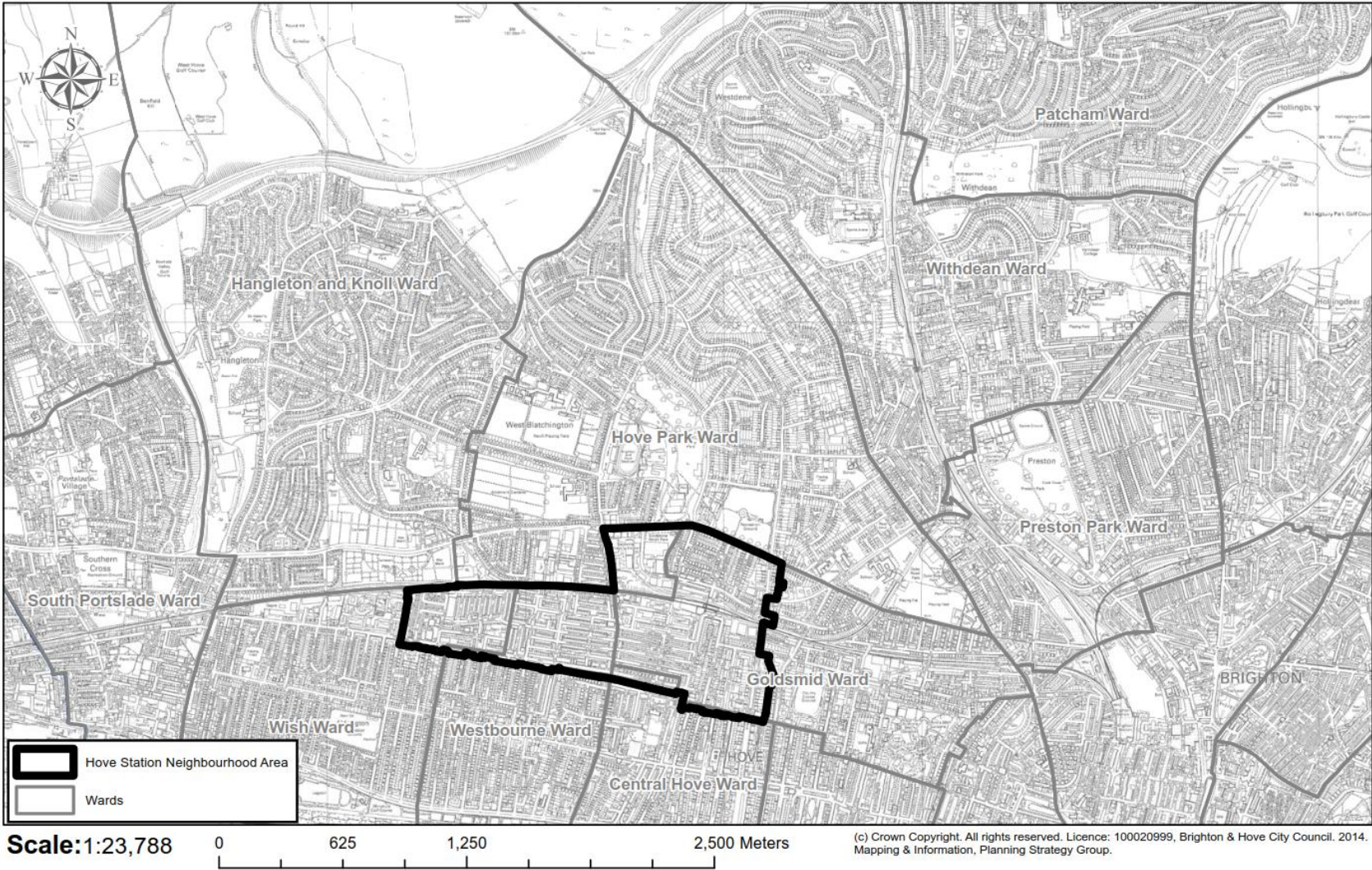
1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Hove Station Neighbourhood Plan (hereafter referred to as 'the HSNP'). The HSNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012.
- 1.2 The Neighbourhood Plan Area is presented in Figure 1.1 and includes the Hove Station Development Area (DA6) proposed in Policy DA6 of the Brighton & Hove City Local Plan Part One (adopted March 2016). It is currently anticipated that the HSNP will be submitted to with Brighton & Hove City Council in 2019.
- 1.3 Key information relating to the HSNP is presented in Table 1.1.

Table 1.1: Key facts relating to the HSNP Neighbourhood Plan

Name of Responsible Authority	Brighton & Hove City Council
Title of Plan	Hove Station Neighbourhood Plan
Subject	Neighbourhood Planning
Purpose	<p>The Hove Station Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with Brighton & Hove City Council's Local Plan.</p> <p>The emerging Hove Station Neighbourhood Plan will be used to guide and shape development within the Hove Station Neighbourhood Area.</p>
Timescale	To 2030
Area covered by the plan	<p>The Neighbourhood Plan Area covers the Hove Station area including the DA6 Hove Station area which relates to Policy DA6 in the Brighton & Hove City Council Local Plan.</p> <p>(Refer to Figure 1.1)</p>
Summary of content	The Hove Station Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan Area.
Plan contact point	<p>Hove Station Neighbourhood Forum (HSNF)</p> <p>Email address: hovestationforum@gmail.com</p>

Figure 1.1: Hove Station Neighbourhood Development Plan Area



SEA explained

- 1.4 The HSNP has been screened in as requiring an SEA by Brighton and Hove City Council (November 2016) as it was considered that the HSNP may give rise to potentially significant environmental effects due to the level of housing to be delivered and the potential for contaminated land.
- 1.5 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the HSNP-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the HSNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.6 The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²
- 1.7 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the HSNP.
- 1.8 In line with the SEA Regulations this Environmental Report must essentially answer four questions:
 - What is the scope of the SEA?
 - What has plan-making/SEA involved up to this point?
 - 'Reasonable alternatives' must have been appraised for the HSNP.
 - What are the appraisal findings at this stage?
 - i.e. in relation to the draft plan.
 - What happens next?

² Directive 2001/42/EC

Structure of this Environmental Report

1.9 This document is the Environmental Report for the HSNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

1.10 Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory³ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁴
What is the HSNP seeking to achieve?	An outline of the contents, main objectives of the HSNP and relationship with other relevant plans and programmes
What is the sustainability 'context'?	The relevant environmental protection objectives , established at international or national level Any existing environmental problems which are relevant to the HSNP including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the HSNP
What is the sustainability 'baseline'?	The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the HSNP including those relating to any areas of a particular environmental importance
What are the key issues & objectives?	Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.
What are the assessment findings at this stage?	The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next?	The next steps for plan making/SEA process.

³ Environmental Assessment of Plans and Programmes Regulations 2004

⁴ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the HSNP

Local Plan context for the HSNP

- 2.1 The HSNP is being prepared in the context of Brighton & Hove's adopted Local Plan (The City Plan Part One), which was adopted in 2016. Neighbourhood Plans will form part of the development plan for the District, alongside, but not as a replacement for the Local Plan. The Local Plan seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Brighton & Hove, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.2 The Brighton & Hove Local Plan (The City Plan Part One) is the principal planning policy document within the planning policy framework for the city. It sets out the current Local Plan for the city in terms of the housing, employment and retail development up until 2027, also detailing the infrastructure requirements in order to enable this development to take place, together with how the Council will continue to protect the city's sensitive historic and natural environments. Additionally, the LDF is supplemented by a number of saved policies from the Brighton & Hove Local Plan (2005).
- 2.3 Outlined in the Brighton & Hove City Plan, the spatial strategy for the city recognises the need for additional housing to accommodate the growing population and house those on the Council's housing register. Increases in commercial, retail and tourism developments are all recognised as mechanisms to improve the economy and help regenerate the city. The spatial strategy for Brighton & Hove is as follows⁵:

"Brighton & Hove is a coastal city providing a sub-regional focus for jobs and services to the surrounding areas. The local authorities along the Sussex coast face similar issues around physical and environmental constraints to accommodating growth and ensuring a balanced approach to housing and employment provision. Recognising the need to plan positively to meet the needs of a growing city, the City Plan seeks to achieve a balanced and sustainable approach to accommodating growth over the plan period."
- 2.4 As such, the development summary for Brighton & Hove is 13,200 new homes, which equates to an annual average rate of provision of 660 dwellings over the plan period 2010-2030.
- 2.5 Policy DA6 within the adopted City Plan sets out the strategy for the Hove Station development area, which is to secure the long term regeneration opportunities and enable its development as an attractive and sustainable mixed-use area focussed on employment. The aim for the area is to secure the creation of a high quality employment environment that will attract investment and new employment opportunities for the city and promote the efficient use of land through, predominantly, employment and residential, mixed use developments. The policy proposes the delivery of a minimum of 525 residential units, retention/replacement of 12,000 sqm of employment floorspace within the Conway Industrial Area and the retention/replacement of 1,000 sqm of employment floorspace outside the Conway Industrial Area.

⁵ Brighton & Hove City Council (2016): 'The City Plan Part One', [online] available to download via: http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20version%20cityplan%20March%202016compreswith%20forward_0.pdf

Vision for the Hove Station Neighbourhood Plan

2.6 The vision for the HSNP, which was developed during earlier stages of plan development, is as follows:

“To create a Neighbourhood Plan for the regeneration of the area which will realise it’s potential by creating a vibrant, coherent community which is a great place to live work and relax.”

2.7 In order to achieve this vision, the Neighbourhood Plan has the following aims:

- To promote a strong and diverse community;
- To provide mixed but complementary land uses although predominantly residential;
- To provide better connectivity and permeability through the area – especially across the railway divide;
- To prioritise sustainable travel and unlock existing transport bottlenecks;
- To conserve the area’s rich urban character drawing on historical design/architectural legacy;
- To provide “Urban” high density: mid-rise development as standard with landmark high rise developments as signature projects at key locations;
- To provide housing with good space and sustainability standards based on national standards;
- To provide new and improved social facilities, schools, nurseries, as needed for the increased population;
- To provide green, natural and attractive spaces for communal activities; and
- To reduce carbon emissions through low carbon new buildings, improved energy efficiency of existing buildings, sustainable and local generation and use of renewable energy.

3. The scope of the SEA

SEA Scoping Report

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England. These authorities were consulted on the scope of the HSNP in 2017.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed
- 3.3 Baseline information (including the context review and baseline data) is presented in **Appendix A**.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1**.

Table 3.1: Consultation responses received on the SEA Scoping Report

Comment	Response
Brighton and Hove City Council (Helen Pennington Sustainability Appraisal Officer)	
4.3 SEA Assessment Questions For clarity, it is recommended to amend the following: Increase the number of new developments meeting or exceeding <u>the required sustainable design criteria</u> buildings standards	Amended
Landscape & Historic Environment 5.2.1 Summary of Baseline It is noted that the scoping report has removed some of the bullet points referring to key characteristics of the NCA Profile “South Coast Plain”, as previously suggested, however some of these still remain which are not of relevance to the area, e.g. the bullet point which refers to “the Isle of Wight and beyond” is not of relevance to the city; and “sand-dune marshes and intertidal marsh communities” do not exist in Brighton & Hove. It is noted that the scoping report now refers to the SDNP designation as previously suggested, however the information provided is incorrect and should be amended as follows: “Although outside of the Neighbourhood Plan Area, over 40% of Brighton & Hove is located within the boundary of the South Downs National Park (SDNP). This land surrounds the built up area of the city, being managed as open space or farmed downland. The landscape type here is defined as sandy arable farmland open downland. It is a distinctive open landscape which is located on the Sandgate Beds of the Lower Greensand chalk formation. The Sandgate Beds are soft yellow sandstones that occur along the Rother Valley, to the north of the main spine of chalk that forms the South Downs ³⁰ . The area’s designation as a National Park recognises that it is a landscape of national importance, with features that create local distinctiveness, giving the landscape its unique sense of place.”	Amended
Historic England (Alan Byrne Historic Environment Planning Adviser)	
Historic England is content that the draft scoping report adequately covers historic environment and heritage matters (the Cultural Heritage) and supports the approach and methodology proposed.	Noted

Comment	Response
Environment Agency	
We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in the local area. This may include flood risk, water quality and biodiversity.	Noted, no significant effects are predicted for biodiversity; as such no objective is included. Objectives for Water Quality have been included within Climate Change and Land, Soil, and Water resources SEA Themes.
We also recommend your SA takes account of relevant policies, plans and strategies including the local Strategic Flood Risk Assessment, flood risk strategies (https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies), and the South East River Basin Management Plan (https://www.gov.uk/government/publications/south-east-river-basin-management-plan)	Noted
We are pleased to see that biodiversity, climatic factors (including flood risk) and land, soil and water resources are being considered as key environmental themes in the SEA process.	Noted

Key sustainability issues

- 3.5 Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of key sustainability issues that should be a particular focus of SEA. These issues are set out below, presented under seven SEA topics:

Air Quality

- There is one Air Quality Management Area (AQMA) partially within the HSNP area (Brighton & Hove City Centre), which is designated for monitored breaches in the annual-mean NO₂ National Air Quality Objective.
- Future development within the HSNP area has the potential to increase traffic along main routes into the city centre.
- Actions within the 2015 Air Quality Action Plan for Brighton & Hove, along with goals relating to sustainable transport within the current Local Transport Plan have the potential to maintain and improve air quality.

Climate Change

- There is a low-medium risk of coastal flooding and surface water drainage flooding within the HSNP area. This has the potential to increase as a result of climate change.
- Based on the information provided in the Surface Water Management Plan, published in 2012, there are no Critical Drainage Areas (CDAs) within the HSNP area due to the absence of any Local Flood Risk Zones (LFRZ).
- Brighton & Hove has recorded consistently lower greenhouse gas (GHG) emissions total per capita in comparison to the regional and national averages.

Landscape and Historic Environment

- The HSNP area contains 1 Grade II* listed building which is the Church of St Barnabus; and approximately 27 Grade II listed buildings. There is no Grade I listed buildings, Scheduled Monuments, registered battlefields or registered historic parks and gardens within the HSNP

area. The 2016 Heritage at Risk Register for South East England⁶ highlights that none of the heritage assets within the HSNP area are deemed to be at risk.

- There are four Conservation Areas that fall within the Neighbourhood Area which cover approximately one quarter of the area of the Neighbourhood Area.
- The HSNP area is located within the 'South Coast Plain' NCA, a narrow strip running along the Hampshire and Sussex coast from the edge of Southampton in the west to Brighton & Hove in the east.

Land, Soil and Water Resources

- The HSNP area does not have a history of heavy industrial land use, with no significant or major pollution incidents recorded. However there may be some land contamination at certain sites within the HSNP area due to current or former uses.
- There are no areas of agricultural land within the HSNP area.
- The entirety of the HSNP area is designated as a Groundwater Nitrate Vulnerable Zone and Source Protection Zone.
- There are no watercourses flowing through the HSNP area.

Population and Community

- Based on the most recent census data available, the population increase within the HSNP area has been higher than in Brighton & Hove, the South East and England.
- Fewer residents within the HSNP area are within the older age categories (45-59 and 60+), in comparison to the regional and national trends.
- There are seven Lower Super Output Areas (LSOAs) located wholly or partly within the HSNP area, five of which are located in top 50% most deprived deciles for the 'Overall Index of Multiple Deprivation' domain.
- At the local level, a notably higher percentage of residents in the HSNP area are employed within professional occupations in comparison to Brighton & Hove, the South East and England.
- Within the HSNP area, 48.2% of residents either own their home outright or have a mortgage, compared to 53.3% for Brighton & Hove. These values are lower than the values for the South East and England. A large proportion of residents (49.7%) within HSNP area either socially rent or privately rent their households in comparison to the totals for the Brighton & Hove (44.5%), the South East (30%), and England (34.5%).

Health and wellbeing

- The majority of residents within the HSNP area consider themselves to have 'very good health' or 'good health', broadly aligning to the totals for Brighton & Hove, the South East of England, and England.
- Future increases in the built-up sections of the HSNP area have the potential to increase traffic along the main routes into the city centre. This has the potential to impact both air quality and the health and wellbeing of residents.

Transportation

- There are two railway stations located within the HSNP area, Hove Station and Aldrington.
- There are a number of bus routes which navigate through the HSNP area into Brighton City Centre as well as other locations throughout the city, including Route 56, Route 5, and Route 2.
- The A203 and A2070 navigate through the HSNP area, with connections to a wider network of A Roads navigating around Brighton.

⁶ Historic England (2016): 'Heritage at Risk 2016 Register – South East', [online] available to download via: <https://www.historicengland.org.uk/images-books/publications/har-2016-registers/> last accessed [19/06/17]

- The main congestion points within the HSNP area are along Portland Road, Sackville Road, Fronthill Road, Blatchington Road and The Drive.
- Route 82 of the National Cycle Network navigates along the eastern boundary of the HSNP area which connects Brighton to the coastline.

SEA Framework

Table 3.2 presents the SEA objectives - grouped under seven topic headings - established through SEA scoping, i.e. in light of context/baseline review and consultation. Taken together, the SEA topics and objectives provide a methodological 'framework' for undertaking assessment.

Table 3.2: SA framework

SEA topic	SEA objective	Assessment questions
Air Quality	Improve air quality in the HSNP area and minimise and/or mitigate against all sources of environmental pollution.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Promote development that will not contribute to the degradation of air quality? • Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the HSNP area?
Climate Change	Reduce the level of contribution to climate change made by activities within the HSNP area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding the required buildings standards? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
	Support the resilience of the HSNP area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that no inappropriate development takes place in areas at higher risk of flooding, and ensure that sufficient mitigation is planned for development in areas at risk, taking the likely effects of climate change into account? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the HSNP area? • Increase the resilience of biodiversity in the plan area to the effects of climate change by improving habitat extent, condition and connectivity?
Landscape and Historic Environment	Conserve and enhance the HSNP area's historic environment, heritage assets, and their settings.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the four Conservation Areas? • Conserve and enhance buildings and structures of architectural or historic interest? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment?
	Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance landscape and townscape features? • Support the integrity of the four Conservation Areas?

SEA topic	SEA objective	Assessment questions
Land, soil and water resources	Protect and enhance the water environment.	Will the option/proposal help to: <ul style="list-style-type: none"> • Avoid, or if this is not possible, minimise impacts on water quality and where possible, support improvements? • Minimise water consumption? • Protect groundwater resources?
	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the remediation of contaminated land? • Promote the use of previously developed land?
Population and Community	Cater for existing and future residents' needs as well as the needs of different groups in the community.	Will the option/proposal help to: <ul style="list-style-type: none"> • Meet the housing and employment needs for all members of the community? • Support the provision of a range of house types and sizes? • Encourage and promote local employment and training opportunities?
	Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities and local services? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing local residents?
Health and Wellbeing	Improve the health and wellbeing residents within the HSNP area.	Will the option/proposal help to: <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Align to the five key priority areas outlined in the Joint Strategic Needs Assessment? • Provide and enhance the provision of community access to green infrastructure and open space, in accordance with City Plan Part 1 policy CP6 (Open Space)? • Reduce noise pollution? • Promote the use of healthier modes of travel? • Facilitate access to the community and services for people with protected characteristics including disabled and older people?
Transportation	Promote sustainable transport use and reduce the need to travel.	Will the option/proposal help to: <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact of road-transport issues on residents?

4. What has the plan making / SEA involved up to this point?

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives/ an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making/ SEA up to this point is told within this part of the Environmental Report.

Overview of plan making / SEA work undertaken since 2013

- 4.3 Plan-making for the HSNP has been underway since 2013. The 'neighbourhood area' covered by the policies of this Plan was formally designated by Brighton and Hove City Council in December 2013.
- 4.4 Initial work involved informal and formal consultation exercises carried out by the HSNF, including on the scope of the Neighbourhood Plan. A significant number of consultation events have since been carried out for the Neighbourhood Plan.
- 4.5 Evidence gathering was also carried out in support of HSNP throughout the process. This evidence has been presented under a number of different 'Issues' which were identified as being of particular concern and are as follows:
- Communication and Community;
 - Conservation and Heritage;
 - Housing and Regeneration;
 - Schools and Community;
 - Sustainable Green Neighbourhoods; and
 - Transport Movement and Connectivity.

Developing the Reasonable Alternatives

- 4.6 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the HSNP. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.
- 4.7 The Brighton and Hove City Plan Part One (adopted March 2016) sets the overall strategic and spatial vision for Brighton & Hove through to 2030. The City Plan recognises the constraints to growth - situated between the South Downs National Park and the sea - and acknowledges that given these constraints the identified housing need is much higher than the city can realistically accommodate. The City Plan sets a minimum housing target of 13,200 new and this reflects the capacity and availability of land/sites in the city at that time. It proposes that the majority of new housing will be located on previously developed sites within the city's built up area and directed to eight specific development areas (DA1 - 8). The City Plan states that these are areas of the city which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration will secure substantial benefits for the city.

- 4.8 Development area DA6 (Hove Station) falls within the Neighbourhood Plan area as illustrated in **Figure 4.1** below. DA6 encompasses the area around Hove Railway Station, which in combination with Old Shoreham Road is an important east-west transport corridor. It includes two industrial areas, a trading estate and retail park with a range of out-of centre bulky goods retail stores. A number of these sites have large areas of surface car parking and single storey developments and have scope to be used more efficiently.

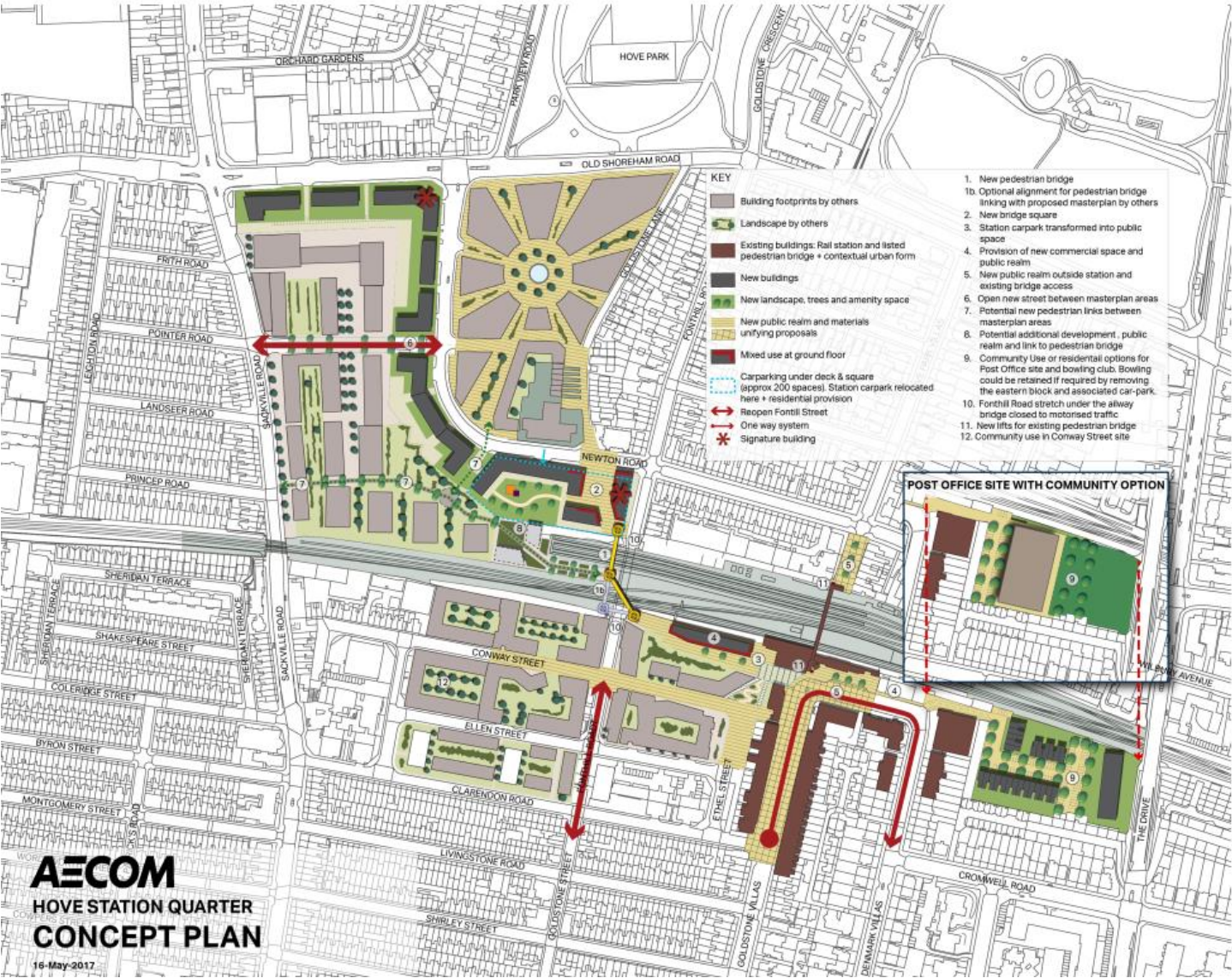
Figure 4.1: Hove Station Neighbourhood Plan Area and Development Area DA6



- 4.9 Policy DA6 within the adopted City Plan sets out the strategy for the Hove Station development area, which is to secure the long term regeneration opportunities and enable its development as an attractive and sustainable mixed-use area focussed on employment. The aim for the area is to secure the creation of a high quality employment environment that will attract investment and new employment opportunities for the city and promote the efficient use of land through, predominantly, employment and residential, mixed use developments. The policy proposes the delivery of a minimum of 525 residential units, retention/replacement of 12,000 sqm of employment floorspace within the Conway Industrial Area and the retention/replacement of 1,000 sqm of employment floorspace outside the Conway Industrial Area.
- 4.10 The strategic allocation proposed through Policy DA6 is the Conway Street Industrial Area. This comprises a comprehensive mixed use redevelopment which will seek to deliver the retention/replacement of 12,000 sqm of employment floorspace and 200 residential units. It should be noted that the coal yard site close to the railway line within development area DA6 was allocated for waste management uses at that time through the emerging East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan.
- 4.11 Since the adoption of the City Plan in 2016 the situation within the Hove Station area has evolved in terms of planning approvals and emerging evidence. North of the railway line planning permission has been granted for two developments; a mixed use redevelopment of the Sackville Trading Estate (180 dwellings) and the Hyde Newtown Road project (66 dwellings).
- 4.12 The adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (Feb 2017) no longer proposes the allocation of the coal yard as a waste management site, following strong opposition from the landowner and local community. This now offers an opportunity for further mixed use development alongside the regeneration of the Sackville Trading Estate. Emerging 3rd party proposals for the regeneration of Sackville Trading Estate and coal yard by Mountpark indicate there is the potential for a mixed use scheme to deliver around 4,700 sqm of B1 office space, 1,300 sqm of B1 creative industries together with 600 residential units.
- 4.13 South of the railway line, the landowner of the Conway Street Industrial Area has consulted with the HSNF and demonstrated the feasibility of delivering a higher number of dwellings within the strategic allocation, particularly when the whole of the DA6 south area is taken into account. It is suggested that the area could deliver 2,000 sqm of B1 office space along with 188 apartments and 2,000 sqm retail in less than 15% of the area.

- 4.14 Furthermore, it is important to note that community engagement work carried out by the HSNF indicates that there is strong support for additional regeneration by the local community, which can deliver modern local employment opportunities, integrated with substantial new housing development and some enhance retail provision.
- 4.15 Through the Ministry for Housing, Communities and Local Government (MHCLG) (previously DCLG) neighbourhood planning framework AECOM were commissioned to assist the HSNF to explore masterplanning issues and design concepts, taking into account of the vision for the Neighbourhood Plan Area and evolving context in terms of emerging development proposals within the Hove Station area.
- 4.16 Following various meetings and site visits AECOM and HSNF formulated a number of high level design principles to guide the concept masterplan:
- Make the Railway Station the centre of the neighbourhood;
 - Introduce a framework of traditional blocks, streets and public spaces;
 - Improve and create connections;
 - Create a cohesive whole between the different proposals for the area; and
 - Bridge the north-south divide due to the railway line.
- 4.17 A number of different concept plans were produced to show different configurations of blocks, streets and public spaces. The different configuration suggested different locations and routes for the pedestrian bridge over the railway line, with two options being tested:
- a) crossing perpendicular to the tracks and
 - b) following a diagonal and land within the area of the station carpark. It was later decided that this idea would suit better the aims of the concept masterplan.
- 4.18 Similarly, modifications to emerging proposals were explored in order to achieve better connections and integration between the different areas. This included the consideration of two concepts for the Royal Mail site, one suggesting a primary school footprint on the space occupied by the existing warehouse and the outdoor playing area on the area occupied by the bowling pitch. The second layout shows a residential configuration of flats. This was later changed to a layout reflecting the surrounding pattern.
- 4.19 Following feedback from the HSNF a preferred concept proposal was produced for the development area DA6. It incorporated all surrounding schemes and identifies key linkages. This is presented in **Figure 4.2** below.

Figure 4.2: Preferred Concept Plan



Establishing the Reasonable Alternatives

- 4.20 As set out above, emerging evidence suggests that there is the opportunity to deliver significantly more housing and employment growth within the Hove Station development area (DA6) than envisaged through the adopted City Plan. It is important to note that the adopted City Plan only proposes a minimum level of employment and housing growth within development area DA6, subject to a number of criteria set out in Policy DA6.
- 4.21 The adopted City Plan recognises that while the Hove Station development area (DA6) offers a significant opportunity for regeneration, there are also a number of constraints that need to be a factor in decision-making. These include a declared Air Quality Management Area, which falls partially within the Neighbourhood Plan Area and development area DA6, as well as several junctions in the area being near or at capacity. There is also a significant number of designated and non-designated heritage assets within and surrounding the Neighbourhood Plan Area.
- 4.22 Taking the above into account, it is considered appropriate for the SEA to focus on the overall level of growth to be delivered within the Hove Station area during the life of the Neighbourhood Plan. In particular, there is a need to consider the relative merits of a lower level of growth closer to the minimum proposed in the adopted City Plan compared to the higher level of growth being proposed by 3rd parties. As a result two options have been identified for detailed assessment through the SEA. These are:
- **Option 1:** Lower level of growth in line with the minimum targets set out in Policy DA6 of the adopted City Plan (i.e. delivery of 525 residential units, retention/replacement of 13,000 sqm of employment floorspace).
 - **Option 2:** Higher level of growth in line with emerging evidence (i.e. delivery of 1,233 to 1,333 residential units and retention/replacement of 23,800 sqm of employment floorspace).

Assessment of the Reasonable Alternatives

- 4.23 **Table 4.1** presents the findings of the assessment of Option 1 and Option 2 outlined above. The appraisal is presented against the seven SEA themes identified at the scoping stage and linked to the SEA framework (**Table 3.2**). Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the options in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

Table 4.1: Appraisal findings: reasonable alternatives linked to overall housing numbers

SEA theme	Discussion of potential effects and relative merits of options	Opt 1	Opt 2
Air Quality	<p>There is one Air Quality Management Area (AQMA) partially within the HSNP area (Brighton & Hove City Centre), which is designated for monitored breaches in the annual-mean NO₂ National Air Quality Objective. The key driver of airborne NO₂ concentrations in urban areas is vehicle emissions. In this context, a higher level of housing and employment growth proposed through Option 2 could cause a greater increase in traffic and therefore NO₂ concentrations within and surrounding the HSNP area compared to Option 1. However, this is dependent on a number of factors.</p> <p>A higher level of growth also presents an opportunity for greater improvements to the local sustainable and active transport networks. The Concept Masterplan and Options Study (July 2017) demonstrates the potential benefits of a greater level of regeneration and growth in the Hove Station area. This includes new public realm areas and improved pedestrian links within the development area, in particular a new pedestrian bridge across the railway line to link the northern and southern development areas. The delivery of more employment floorspace through Option 2, in particular high quality flexible office/business (B1) floorspace, alongside new homes will reduce the need for residents to commute for employment.</p> <p>There is no current transport modelling to indicate the likely impacts of an increased level of growth within the Hove Station area on the highway network. However, emerging findings of transport assessments being produced to support applications for redevelopment within the Hove Station area suggest that there will not be any significant negative effects and in some cases fewer vehicle trips. It is assumed that the mitigation provided through adopted City Plan policies - including Policies DA6 and CP9 (Sustainable Transport) - will help to mitigate and reduce the significance of any residual effects. At this stage it is uncertain if the higher level of growth proposed would result in a significant negative effect on air quality. However, it is considered likely that a higher level of growth will deliver more developer contributions and therefore offers a better opportunity to improve the local sustainable and active transport network.</p>	2	1
Climatic factors	<p>In terms of climate change mitigation, Option 2 (which facilitates an increased level of development) will lead to an increased level of greenhouse gas emissions through construction and the associated carbon footprint of new residents living and working the HSNP area. This higher level of growth may however again enable more effective improvements to walking and cycling and public transport links through the infrastructure improvements provided through greater developer contributions.</p> <p>In terms of climate change adaptation, enhancements to the Neighbourhood Plan area's urban vegetation networks will be a key means of helping the plan area adapt to the effects of climate change. This includes through helping to regulate extreme temperatures and regulate surface water run-off. In this context the direct provision of urban vegetation improvements to accompany new development areas may be more achievable through the development proposed through Option 2, again due to the reliance on mechanisms such as developer contributions.</p> <p>Given the overall uncertainty with regards to outcomes of and associated emissions reductions through improved sustainable transport modes, the relative merit of Option 2 over Option 1 is uncertain. However, it is considered that when taking into account climate change adaptation issues - Option 2 offers the greatest potential for positive effects.</p>	2	1
Landscape and historic environment	<p>The HSNP area contains one Grade II* listed building and approximately 27 Grade II listed buildings and there are also four Conservation Areas that partially fall within it. Due to the HSNP area's urban location, development will largely be confined within the DA6 boundary and on previously developed land. A small proportion of the development area around the railway station falls within the conservations area.</p> <p>The regeneration of brownfield land has the potential to result in both positive and negative effects on the historic environment. Positive effects could arise through the removal of buildings that are currently detracting from the townscape or through improvements to the public realm and signage. Negative effects could arise through the loss of open space or taller buildings that may impact views.</p>	2	1

SEA theme	Discussion of potential effects and relative merits of options	Opt 1	Opt 2
	<p>It could be assumed that the higher level of growth proposed through Option 2 could be more likely to result in negative effects compared to the lower level of growth proposed through Option 1. A higher level of growth is likely to be delivered through higher density development and higher building heights; however, it also provides an opportunity for a greater level of regeneration and improvements to the public realm. It is important to note that emerging 3rd party proposals and the Masterplan Study⁷ suggest that the higher level of growth proposed by Option 2 can be accommodated within the development area through a more efficient use of space. The masterplan study took into consideration the relationship between levels, open space and building heights.</p> <p>On balance, it is considered that Option 2 provides the greatest opportunity for significant positive effects on the historic environment through the regeneration of brownfield land, in particular industrial areas that are currently detracting from the townscape and setting of the Conservation and listed buildings. The Masterplan Study demonstrates the improvements to the public realm that could be delivered as a result of Option 2. There is greater potential for a significant long term positive effect through the level of development proposed under Option 2 compared to Option 1. The nature and significance of effects will ultimately be dependent on the design and precise layout of development. It is considered that policies within the adopted City Plan and emerging Neighbourhood Plan relating to design and the protection of the historic environment should help to minimise the potential for negative effects on the historic environment, particularly around the railway station.</p>		
Land, soil and water resources	<p>The HSNP area does not have a history of heavy industrial land use; however, there may be some land contamination at certain sites within the HSNP area due to current or former uses. There is little to differentiate the options in terms of this issue, although the delivery of a higher level of growth through Option 2 could make the remediation of land more viable but this is uncertain at this stage.</p> <p>In terms of water quality, at this strategic level it is not possible to comment on potential benefits of either growth level without an understanding of the design measures that will be put in place for each development to come forward as part of each level of growth. Development coming forward under either option could incorporate sustainable drainage systems.</p>	1	1
Population and community	<p>Option 2 is likely to have a positive effect of greater significance compared to Option 1 as the higher level of proposed growth will result in more new homes, more employment opportunities and greater improvements to sustainable transport modes as well as improvements to the public realm.</p> <p>In terms of affordable housing, such provision may be more economically viable for developers to be delivered through Option 2 given the higher level of new homes and therefore could be delivered. There is also greater potential for improvements to community facilities through the higher level of growth proposed under Option 2.</p>	2	1
Health and wellbeing	<p>Impacts on the health and wellbeing SEA theme within an urban location such as the HSNP area are closely interlinked with those of the population and community SEA theme. Effects are most likely to be realised through three key areas: access to high quality public realm and green spaces, delivery of appropriate housing, and the impacts of traffic and noise.</p> <p>A higher level of growth proposed through Option 2 provides an opportunity for the significant regeneration of brownfield land and delivery of an improved public realm. Improving the public areas and pedestrian links between areas and in particular across the railway line will help to encourage walking/ cycling and have long term positive effects on the health of the local community.</p> <p>The Concept Masterplan and Options Study (July 2017) demonstrates the potential benefits of a greater level of regeneration and growth in the Hove Station area. This includes new public realm areas and improved pedestrian links within the development area, in particular a new pedestrian bridge across the railway line to link the northern and southern development areas. The delivery of more employment floorspace through Option 2, in particular high quality flexible office/business (B1) floorspace, alongside new homes will reduce the need for residents to commute for employment.</p> <p>While there is no current transport modelling to indicate the likely impacts of an</p>	2	1

⁷ AECOM (2017) Hove Station Quarter Concept Masterplan and Options Study.

SEA theme	Discussion of potential effects and relative merits of options	Opt 1	Opt 2
	increased level of growth within the Hove Station area on the highway network, it is assumed that the mitigation provided through adopted City Plan policies - including Policies DA6 and CP9 (Sustainable Transport) - will help to mitigate and reduce the significance of any residual effects. At this stage it is uncertain if the higher level of growth proposed would result in a significant negative effect on air quality and therefore health. However, it is considered likely that a higher level of growth will deliver more developer contributions and therefore offers a better opportunity to improve the local sustainable and active transport network. Despite the uncertainties relating to impacts on traffic and air quality, it is considered that Option 2 offers the best opportunity for the regeneration of the development area and delivery of an improved public realm.		
Transport	There is no current transport modelling to indicate the likely impacts of an increased level of growth within the Hove Station area on the highway network. However, emerging findings of transport assessments being produced to support applications for redevelopment within the Hove Station area suggest that there will not be any significant negative effects and in some cases fewer vehicle trips. It is assumed that the mitigation provided through adopted City Plan policies - including Policies DA6 and CP9 (Sustainable Transport) - will help to mitigate and reduce the significance of any residual effects. At this stage it is uncertain if the higher level of growth proposed would result in a significant negative effect on air quality. However, it is considered likely that a higher level of growth will deliver more developer contributions and therefore offers a better opportunity to improve the local sustainable and active transport network. As a result, Option 2 is considered to perform better than Option 1 in terms of transport until there is evidence to suggest that the level of growth proposed under Option 2 cannot be delivered due to highway constraints.	2	1

Developing the Preferred Approach

4.24 The preferred approach at this stage is Option 2. It is in line with the policies and aspirations of the adopted City Plan, reflects emerging proposals from 3rd parties within the development area and is supported by a Concept Masterplan and Options Study (2017). The preferred approach provides a significant opportunity to regenerate large areas of previously developed land within the Neighbourhood Plan area and deliver significant benefits to the local community, which includes new homes and employment opportunities as well as improvements to sustainable transport modes and the public realm.

Development of neighbourhood plan objectives

4.25 To support the implementation of the vision for the Neighbourhood Plan discussed in Chapter 2, the current version of the HSNP puts forward 10 objectives supported by 35 policies to guide development in the Neighbourhood Plan area, which have evolved through five years of community engagement.

4.26 The objectives, which were developed following extensive community consultation and evidence gathering, are as follows:

- A strong and diverse community;
- Mixed but complementary land uses although predominantly residential;
- Better connectivity and permeability through the area – especially across the railway divide;
- Prioritising sustainable travel and unlocking existing transport bottlenecks;
- Rich urban character drawing on historical design/architectural legacy;
- “Urban” high density: mid-rise development as standard with landmark high rise developments as signature projects at key locations;
- Housing with good space and sustainability standards based on national standards;

- New and improved social facilities, schools, nurseries, as needed for the increased population;
- Green, natural and attractive with spaces for communal activities; and
- Reduced carbon emissions through low carbon new buildings, improved energy efficiency of existing buildings, sustainable and local generation and use of renewable energy.

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the emerging Regulation 14 version of the HSNP. Section 6 subsequently discusses overall conclusions at this current stage and recommendations for the next stage of plan-making.

Approach to the appraisal

- 5.2 The appraisal is structured under the seven SEA topics scoped into the assessment. For each topic 'significant effects' of the current version of the HSNP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.3 Every effort is made to identify/evaluate effects accurately; however, this is inherently challenging given the high level nature of the HSNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and to ensure that all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Air Quality

- 5.4 The SEA scoping report noted that there is one Air Quality Management Area (AQMA) partially within the HSNP area (Brighton & Hove City Centre), which is designated for monitored breaches in the annual-mean NO₂ National Air Quality Objective.
- 5.5 Although the effects of air pollution may be offset in part by factors such as measures implemented through the Brighton and Hove City Council Air Quality Action Plan⁸ and the provision of green infrastructure enhancements, it is likely that new housing and employment provision within the Neighbourhood Plan area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂. There is no current transport modelling to indicate the likely traffic impacts of emerging proposals from 3rd parties on the highway network. Mitigation provided through adopted City Plan policies - including Policies DA6 and CP9 (Sustainable Transport) - will help to reduce the significance of residual effects.
- 5.6 Policy 1 of the HSNP promotes a comprehensive and integrated approach to development in the area shown in the adopted City Plan as DA6. It requires that development proposals reflect the need for area-wide transport and movement linkages and that advantage of Hove Station as a sustainable transport hub is taken. This policy should have a positive effect through ensuring that future development encourages the use of public transport which should in turn lower the level of private vehicle use.
- 5.7 Policy 10 requires that *"As part of the design of new schemes significant numbers of trees including street trees need to be provided."* The policy goes into further detail, explaining that *"Developers will be expected to plant and fund planting of trees, including street trees on site and within the neighbourhood plan area at the rate of 1 street tree per residential dwelling or 1 per 100"*.

⁸ Brighton and Hove City Council (2015) Air Quality Action Plan [online] available at: <http://www.brighton-hove.gov.uk/content/environment/noise-and-pollution/air-quality-management-city>

- 5.8 Urban vegetation has been shown to directly and indirectly effect local air quality.⁹ This can include through temperature reduction, other microclimatic effects; and also the removal of air pollutants.
- 5.9 At this stage it is uncertain if the level of growth being supported through the Neighbourhood Plan and emerging through the development control process will have a significant negative effect on traffic. Emerging findings of transport assessments being produced to support applications for redevelopment within the Hove Station area suggest that there will not be any significant negative effects and in some cases fewer vehicle trips. Furthermore, policies within the adopted City Plan and Neighbourhood Plan seek to minimise the impacts of new development on traffic and encourage a modal shift to more sustainable modes of transport. There is a significant opportunity to regenerate the area and promote Hove Station as a sustainable transport hub for the city. This along with the delivery of significant homes and employment opportunities could help to reduce commuting by private vehicle. It is considered that this has the potential for a long term positive effect and therefore indirect positive effects for air quality. This will also help to reduce the potential cumulative effects of redevelopment on traffic and therefore air quality outside the Hove Station area.

Climate Change

- 5.10 The HSNP contains a number of policies which have direct relevance to climate change considerations. The assessment of the Plan's performance with regard to climate change is outlined below, with discussions on the performance regarding both climate change mitigation and climate change adaptation measures.

Climate change mitigation

- 5.11 In terms of climate change contribution, Brighton & Hove has recorded consistently lower greenhouse gas (GHG) emissions total per capita in comparison to the regional and national averages. Additionally, per capita GHG emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan Area would contribute to increases in the absolute levels of GHG emissions.
- 5.12 Policy 1 of the HSNP requires that development proposals in area DA6 of the City Plan provide benefits to Hove Station as a sustainable transport hub for the city. This should result in a positive – albeit minor – effect on climate change mitigation measures by encouraging a modal shift from private vehicle usage to public and active transportation methods. Policy 16 should also have positive effects by stating that *“New developments should aim to minimise car based travel”* and additionally that *“New developments proposed will need to ensure that the Hove Station Quarter is easily accessible on foot and by cycle and can be traversed by those modes.”*

Climate change adaptation

- 5.13 There is a low-medium risk of coastal flooding and surface water drainage flooding within the HSNP area. Bearing this in mind it is important to note that climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change (such as flooding due to increased precipitation). Consequently this will create an associated need for resilience and adaptation.
- 5.14 Policy 17 requires that developers will be expected to contribute to a number of improvements in the area as set out in the schedule of projects in Annex 1 of the HSNP. In this regard, Annex 1 highlights that *“Targeted new and retrofitted green infrastructure measures in public realm spaces for biodiversity and climate benefits, including increasing provision of Green Roof/Walls and Planting of street trees”* are considered important and that the proposed funding route for these requirements will be through section 106 agreements. Additionally, policy 17 goes on to

⁹ Defra (2010) what impact do trees have on air pollutant concentrations? [online] available at: <https://laqm.defra.gov.uk/laqm-faqs/faq105.html>

state that “to ensure the longevity of improvements such as tree planting the Forum proposes that an environmental endowment fund is set up to support long term maintenance in the neighbourhood area. It is proposed that CIL contributions are used to support such a fund”.

- 5.15 Although the measures outlined in Policy 17 are not directly driven by climate change adaptation priorities, the current NPPF states that well planned green infrastructure can help an area adapt to, and manage the risks of climate change (including flood risk). As such, as this policy provides for green infrastructure within the Neighbourhood Plan Area it is a key way in which the HSNP will help to promote climate change adaptation measures. Additionally, the Policy highlights a clear route for long term maintenance and provision of the green infrastructure. As such, this policy should result in significantly positive effects.

Landscape and Historic Environment

- 5.16 The HSNP area contains one Grade II* listed building which is the Church of St Barnabus; and approximately 27 Grade II listed buildings and there are also four Conservation Areas that partially fall within the Neighbourhood Plan Area and cover approximately one quarter of the total area.
- 5.17 New development has the potential to lead to beneficial or adverse effects on the historic environment, including through affecting the setting of cultural heritage assets. This is reflected in the approach taken by the HSNP - which aims to enable public realm improvements while allowing the conservation and enhancement of the historic environment. In this regard, Policy 15 states that when considering visual and other impacts of new development of the Hove Station Quarter on the Hove Station core of the Conservation Area “*there will need to be a careful balance between heritage considerations and the significant improvements and public realm investments that will arise from such new developments.*” This should result in a positive, albeit minor effect, on the historic environment of the HSNP area. Policy 11 limits building heights to six storeys in certain areas, which will help to minimise the impacts on views to and from the Conservation Areas and listed buildings.
- 5.18 The HSNP contains policies that support development being promoted by 3rd parties and coming forward through the development management process. It has been informed by a Concept Masterplan and Options Study (2017) that took into account of the vision for the Neighbourhood Plan area and evolving context in terms of emerging development proposals within the Hove Station area. The Masterplan Study also took into consideration the relationship between levels, open space and building heights.
- 5.19 Policies within the adopted City Plan (including DA6 and CP12 to CP16) will help to minimise potential negative effects on the historic environment. The levels of regeneration supported by the HSNP have the potential for significant long term positive effects on the historic environment through the removal of buildings that are currently detracting from the townscape and through improvements to the public realm and signage. Sensitive design in areas in close proximity or within Conservation Areas should ensure that there are no residual negative effects.
- 5.20 To ensure that the historic environment is adequately considered as part of any proposal for development it is recommended that Policy 15 is strengthened further by including a need for development to contribute towards the conservation and enhancement of historic environment features. Additionally, as discussed, the SEA scoping report identified that there are four Conservation Areas within the HSNP area – it is recommended that the appropriate Conservation Area Appraisals are therefore also referenced within the HSNP.
- 5.21 In terms of cumulative effects, this is uncertain at this stage and dependent on the design and layout of proposed development within and outside the Hove Station area.

Land, soil and water resources

- 5.22 The HSNP area does not have a history of heavy industrial land use; however, there may be some land contamination at certain sites within the HSNP area due to current or former uses. No recorded significant or major industrial pollution incidents have been recorded by the

Environment Agency under the EC Integrated Pollution Prevention and Control Directive (IPCC). However, this does not preclude the potential for localised soil or groundwater contamination to be present, for example from existing or previous employment uses at certain sites within the HSNP area. Any potential effects on these will be required to be assessed on a site by site basis. As such, it is recommended that policy wording is included within the HSNP to require proposals to consider the effect of localised site contamination on new development.

- 5.23 The scoping report noted that the entirety of the HSNP area is designated as a Groundwater Nitrate Vulnerable Zone. This is defined as an “area of land that drains into a freshwater water body which has or could have if action is not taken, a nitrate concentration greater than 50mg/l.” A key component of nitrate pollution is caused by surface water runoff from agricultural activities which are highly unlikely to be a significant risk in the HSNP area. However, the Neighbourhood Plan does have an ability to slow down surface water runoff rates (which contribute to agricultural and other pollution entering water bodies) by minimising the area of impermeable surfaces created by the built environment through encouraging innovative drainage systems such as sustainable drainage systems. Policy DA6 within the adopted City Plan states that development must incorporate appropriate surface water drainage measures.
- 5.24 Taking the above into account it is considered unlikely that the HSNP will have a significant residual effect in relation to this SEA theme.

Population and Community

- 5.25 The SEA scoping report highlighted that the population of the HSNP area increased at a greater rate between the years 2001-2011 in comparison to the local, regional and national comparators and that there were fewer residents within older age categories within the HSNP area, with the largest proportion of people aged between 25 - 44. It also highlighted that a notably higher percentage of residents in the HSNP area are employed within professional occupations in comparison to Brighton & Hove, the South East and England. This suggests that, unlike in many areas of the country the HSNP area has a high proportion of young residents and a growing population which in turn will help to support a vibrant sustainable community. However, the area may face challenges associated with a growing population such as increasing pressure on community services and facilities.
- 5.26 In this context, the HSNP has a strong focus on issues relating to the Population and Community SEA topic including factors relating to economic viability. For instance, Policy 1 requires that a “*comprehensive and integrated approach to development in the area*” is taken, and that “*the area shown in the City Plan as DA6 will be suitable for a mix of uses comprising residential, commercial, small retail and cultural uses including small workshops.*” Policy 9 places an emphasis on supporting cultural facilities including arts and crafts workshops. Through signalling support for small retail and cultural uses – these policies should both have a positive effect on the local economy and local business sustainability.
- 5.27 The HSNP also deals with housing and housing affordability. In this context, policy 7 is in place to support the development of affordable homes within the area. For instance, the plan supports “*innovative approaches to the promotion and delivery of genuinely affordable homes in the area and encourages the City Council and local developers to develop approaches that can be maintained in perpetuity.*” Furthermore Policy 8 requires that “*Developers will be encouraged to include High Quality Housing Schemes for the Elderly in accordance with identified needs.*”
- 5.28 In the context of the above, the Neighbourhood Plan places a strong emphasis on maintaining community services and facilities which in turn will help to maintain a strong economy, and support community vitality. This will have a long-term positive cumulative effect with other plans and projects proposing redevelopment outside the Hove Station area.
- 5.29 Policy 10 states that “*designs should make good use of land and create high quality, well landscaped spaces. Strong emphasis should also be placed on the design of the street environment to achieve a high quality public realm, capable of being used in a variety of ways, with a strong emphasis on planting.*” Although this policy should result in positive effects – it is

recommended that this policy is strengthened further through alignment with, and direct reference to, the Brighton and Hove Green Infrastructure Network Study.¹⁰

Health and Wellbeing

- 5.30 The majority of residents within the HSNP area consider themselves to have ‘very good health’ or ‘good health’, broadly aligning to the totals for Brighton & Hove, the South East of England, and England. However, future increases in the built-up sections of the HSNP area have the potential to increase traffic along the main routes into the city centre. This has the potential to impact both air quality and the health and wellbeing of residents but this is uncertain at this stage. The level of regeneration supported through the HSNP will improve the public realm and pedestrian links between areas and in particular across the railway line will help to encourage walking/ cycling and could have long term positive effects on the health of the local community. The delivery of new homes and employment opportunities alongside improvements to sustainable transport modes is likely to have a long term positive effect on the health of the local community.
- 5.31 Policy 13 states that applications *“for community facilities such as day nurseries, GP surgeries or sports facilities will be considered a positive addition to the use mix in the Hove Station Quarter and will be considered favourably.”* This policy, although purely aspirational, should result in minor positive effects for the Neighbourhood Plan area.
- 5.32 Policy 10 requires that *“designs should make good use of land and create high quality, well landscaped spaces. Strong emphasis should also be placed on the design of the street environment to achieve a high quality public realm, capable of being used in a variety of ways, with a strong emphasis on planting.”* Greenspaces are important community assets and can provide valuable sites for recreation, exercise and socialising, and as such, this policy is likely to contribute significantly (although indirectly) to resident’s physical and mental health. However, as discussed under the Population and Community topic it is recommended that this policy is strengthened further through alignment with, and direct reference to, the Brighton and Hove Green Infrastructure Network Study.¹¹

Transportation

- 5.33 The SEA scoping report highlighted that over 59% of residents within the HSNP area have access to either one or two cars or vans, with these modes of transport being the most popular choice for travelling to work.
- 5.34 In this context, redevelopment within the HSNP area has the potential to increase traffic but also offers opportunities to improve access to sustainable modes of transport. However, it should be noted that, in the context of the wider Brighton & Hove area, the impact of development within the Neighbourhood Plan area on overall traffic and public transport capacity is uncertain. Emerging findings of transport assessments being produced to support applications for redevelopment within the Hove Station area suggest that there will not be any significant negative effects and in some cases fewer vehicle trips. Furthermore, mitigation provided through adopted City Plan policies - including Policies DA6 and CP9 (Sustainable Transport) - will help to reduce the significance of any residual effects.
- 5.35 The HSNP has the potential to implement policies which promote modal shift from the private car which will help reduce the impact of traffic on the public realm. In this regard, the two key policies of note in this theme include Policy 1, which requires that development proposals *“need to be sympathetic to and reflect the need for area-wide transport and movement linkages”* and Policy 16, which states that *“new developments should aim to minimise car based travel, which will require travel plans as well as a range of other measures such as designated car club spaces to be allocated throughout the area in discussion with the city’s car clubs and extensive cycle parking to standards as set out in SPD 14.”* It also goes on further to

¹⁰ Brighton and Hove Council (2009) Green Infrastructure Network Study [online] available at: <http://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one-background-studies>

¹¹ Ibid.

set out that new development proposed will need to ensure that the Hove Station Quarter is easily accessible on foot and by cycle and can be traversed by those modes.

- 5.36 These policies should both provide positive effects for transportation – with numerous cross cutting effects with other themes. For instance, Policy 1 and Policy 16 are likely to also have beneficial outcomes for air quality objectives. Overall, the HSNP is likely to have a long-term positive cumulative effect with other plans and projects proposing redevelopment more widely across Brighton & Hove. However, this is uncertain at this stage.

6. Conclusions at this current stage

Potential effects identified

- 6.1 The assessment found that the current version of the HSNP is likely to lead to long term positive effects, across the majority of SEA topics assessed. The HSNP supports proposals that are coming forward through the development management process for the regeneration of previously developed land. These proposals along with a Concept Masterplan and Options Study (2017) demonstrate that there is the opportunity for significant brownfield regeneration within the Neighbourhood Plan area, in particular development area DA6 proposed through the adopted City Plan. This has the potential to deliver a significant number of new homes and employment opportunities along with improvements to the public realm and sustainable transport modes, with significant long term positive effects for a number of SEA themes.
- 6.2 There are uncertainties around the nature and significance of effects on transport and air quality given the lack of evidence relating to impacts on traffic. However, the assessment concluded that residual effects are still likely to be positive given the opportunity to regenerate the area and promote Hove Station as a sustainable transport hub for the city. This along with the delivery of significant homes and employment opportunities could help to reduce commuting by private vehicle. It is considered that this has the potential for a long term positive effect on transport and therefore indirect positive effects for air quality and climate change. It will be important for any proposal coming forward to demonstrate how they will minimise impacts on traffic and improve sustainable transport modes.
- 6.3 Policies within the adopted City Plan and the HSNP should ensure that development coming forward is sensitively designed and that building heights are limited so that there are no residual negative effects on the historic environment.

Recommendations at this current stage

- 6.4 A number of recommendations have been made for improving the sustainability performance of the current version of the HSNP. These are summarised as follows:
- To ensure that the historic environment is adequately considered as part of any development management process it is recommended that Policy 15 is strengthened by including a need for development to contribute towards the conservation and enhancement of historic environment features.
 - It is recommended that the relevant Conservation Area Appraisals are referenced within the HSNP.
 - It is recommended that Policy 10 is strengthened further through alignment with, and direct reference to, the Brighton and Hove Green Infrastructure Network Study.¹²

¹² Brighton and Hove Council (2009) Green Infrastructure Network Study [online] available at: <http://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one-background-studies>

7. What are the next steps?

- 7.1 This Environmental Report accompanies the Pre-Submission version of the Hove Station Neighbourhood Plan for consultation.
- 7.2 Following consultation, any representations made will be considered by the Hove Station Neighbourhood Forum, and the Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Brighton & Hove City Council, for subsequent Independent Examination.
- 7.3 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Brighton & Hove City Plan.
- 7.4 If the subsequent Independent Examination is favourable, the Hove Station Neighbourhood Plan will be subject to a referendum, organised by Brighton & Hove City Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Hove Station Neighbourhood Plan will become part of the Development Plan for Brighton & Hove City, covering the defined Neighbourhood Plan area.

Appendix A Scoping Information

1. Air Quality

Focus of Theme:

- Air pollution sources
- Air quality hotspots
- Air quality management

Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- ‘Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan’.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

In terms of the local context, Brighton & Hove City Council are required to monitor air quality across the county under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area. As such the Brighton & Hove AQAP was created for the two AQMAs within Brighton & Hove City Council. Both of the AQMAs were designated for exceeding annual mean Nitrogen Dioxide (NO₂). The AQAP sets out actions to positively impact the local air quality, including measuring, model and reporting on air quality, to encourage low emission technology and encourage and foster behavioural change/modal shift. Brighton & Hove City Plan Part 1¹³ Policy CP9 (Sustainable Transport) seeks to manage and develop sustainable transport in the area, improving mobility for residents and freight to reduce traffic and congestion.

Baseline Summary

Summary of Current Baseline

Brighton & Hove City Council's area is compliant with all pollutants listed in the national Air Quality Strategy (AQS) with the exception of nitrogen dioxide (NO₂). The city has had an Air Quality Management Area (AQMA) for non-compliance with the NO₂ national standard since 2004. Two AQMAs were declared in 2013 and include Brighton & Hove Centre connected with West Portslade which is within the Hove Station Neighbourhood Plan Area (HSNP area), and Rottingdean High Street as a standalone AQMA.

Both AQMAs are designated due to exceedances in annual NO₂, which is attributable to road traffic and congestion in the area. The 2016 Brighton & Hove City Council Air Quality Annual Status Report¹⁴

¹³ Brighton & Hove City Council (2016) Brighton & Hove City Plan Part 1 available to download [online] <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one> last accessed 26/10/17

¹⁴ Brighton & Hove City Council Air Quality Annual Status Report (ASR) 2016 available to download [online] <https://www.brighton-hove.gov.uk/sites/brighton->

states that air quality with regard to NO₂ in Brighton & Hove is improving or staying the same in all monitored locations, which meant that it was not necessary to declare any further AQMAs.

Potential effects identified

Summary of Future Baseline

Future development within the HSNP area has the potential to increase traffic and congestion along the main routes into the city, placing pressure on the existing highways network. This is particularly relevant in relation to the Brighton & Hove Centre AQMA. Nevertheless, if the strategic objectives of the 2015 Air Quality Action Plan for Brighton & Hove are achieved, then there is potential to maintain and improve future air quality within and surrounding the HSNP area.

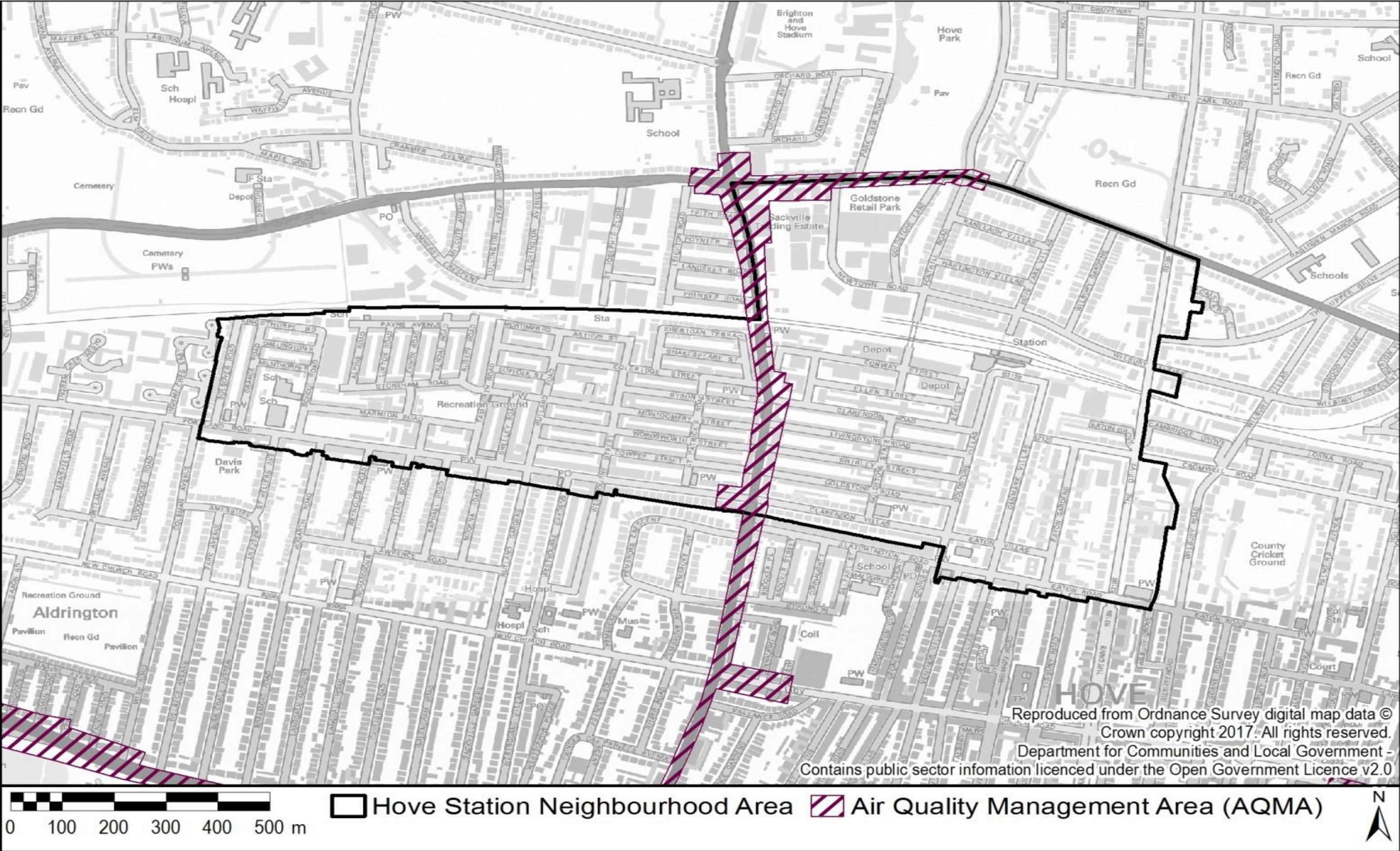
Key Sustainability Issues

- There is one Air Quality Management Area (AQMA) partially within the HSNP area (Brighton & Hove City Centre), which is designated for monitored breaches in the annual-mean NO₂ National Air Quality Objective.
- Future development within the HSNP area has the potential to increase traffic along main routes into the city centre.
- Actions within the 2015 Air Quality Action Plan for Brighton & Hove, along with goals relating to sustainable transport within the current Local Transport Plan have the potential to maintain and improve air quality.

What are the SEA objectives and assessment questions for the Air Quality SEA theme?

SEA objective	Assessment Questions
Improve air quality in the HSNP area and minimise and/or mitigate against all sources of environmental pollution.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Promote development that will not contribute to the degradation of air quality? • Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the HSNP area?

Figure 2.1 AQMA



2. Biodiversity

Focus of Theme:

- Nature conservation designations
- Habitats
- Species
- Geodiversity

Policy Context

At the European level, the EU Biodiversity Strategy¹⁵ was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'*.

The Natural Environment White Paper (NEWP)¹⁶ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of Local Authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*¹⁷.

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across Local Authority boundaries.

¹⁵ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at:

<http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [30/01/17]

¹⁶ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [30/03/17]

¹⁷ DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [03/04/17]

- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. ‘a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities’).
- Plan positively for ‘green infrastructure’ as part of planning for ‘ecological networks’.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The adopted Brighton and Hove City Plan Part One (2016) seeks to develop programmes and strategies which aim to conserve, restore and enhance biodiversity and promote improved access to it through Policy CP10.

Baseline Summary

Summary of Current Baseline

There are no international, national or locally designated sites for biodiversity within the HSNP area. Castle Hill Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) are located 8 km to the west of HSNP area. Beachy Head West Marine Conservation Zone extends from the Marina to Beachy Head, approximately 6.5 km west of the HSNP area.

There are no Local Nature Reserves within the HSNP area or immediately adjacent to the boundary. Withdean and Westdene Woods LNR is approximately 1.5 km to the north of the HSNP area.

There are no Sites of Nature Conservation Interest (SNCIs) within the neighbourhood area or adjacent to the boundary. The nearest SNCI is Three Cornered Copse approximately 1.5 km away to the north.

Summary of Future Baseline

There are no designated sites for biodiversity within or in close proximity to the HSNP area. The majority of the area is brownfield land so it is therefore predicted that the future baseline is unlikely to significantly change without development within the HSNP area.

Key Sustainability Issues

No key issues have been identified for biodiversity and geodiversity.

What are the SEA objectives and assessment questions for the Biodiversity SEA theme?

Taking the above into account and the findings of the SEA determination (2016) produced by Brighton & Hove City Council it is considered that biodiversity and geodiversity should not be the focus of further assessment work and that this theme should be scoped out for the purposes of the SEA process.

3. Climate Change

Focus of Theme:

- Contribution to climate change
- Effects of climate change
- Climate change adaptation
- Flood risk

Policy Context

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

- *'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'*¹⁸

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

1. Flooding and coastal change risks to communities, businesses and infrastructure;
2. Risks to health, well-being and productivity from high temperatures;
3. Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
4. Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
5. Risks to domestic and international food production and trade; and
6. New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act¹⁹ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- **2050 Target.** The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- **Carbon Budgets.** The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

¹⁸ GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [27/01/17]

¹⁹ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [21/02/17]

- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page²⁰.

Key messages from the National Planning Policy Framework (NPPF) include:

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008²¹. Specifically, planning policy should support the move to a low carbon future through:
 - Planning for new development in locations and ways which reduce GHG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act²² highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS)²³

Further guidance is provided in the document 'Planning for SuDs'.²⁴ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

²⁰ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>> last accessed [21/02/17]

²¹ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

²² Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

²³ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

Undertaken in June 2011, Brighton & Hove's Preliminary Flood Risk Assessment²⁵ was a high level screening exercise to collect information on past historic and future potential floods. This information was then used to identify flood risk areas in the city. This study formed part of a larger delivery project:

The Surface Water Management Plan (SWMP)²⁶ was published in 2014. The objectives of the SWMP are as follows:

- Collate and map all the existing data relating to surface water flood risk in the local authority area including flood defence and drainage infrastructure (but excluding foul sewers).
- Review of EA national datasets with local knowledge and SWMP database.
- Establish areas where flood risk is currently a problem or where there could be risks in the future as a result of development and/or climate change.
- Identify ownership of drainage features and assets.
- Determine an approach to evaluate these problems and to devise potential solutions if practicable.
- Assess, plan and improve current and future drainage asset maintenance regimes using flood risk information.
- Development of future planning strategies and policies to facilitate flood risk mitigation and management.

The Local Flood Risk Management Strategy (2012)²⁷ for Brighton & Hove considers the flood risks from surface water, groundwater and ordinary watercourses within the city in order to inform the spatial planning process.

The adopted Brighton and Hove City Plan Part One (2016) includes a number of policies that seek to mitigate against and adapt to climate change, which includes policies CP8 (Sustainable Buildings), CP9 (Sustainable Transport) and CP11 (Flood Risk).

Summary of Current Baseline

Contribution to Climate Change

In relation to GHG emissions, source data from the Department of Energy and Climate Change suggests that Brighton & Hove has had consistently lower per capita emissions total than that of both the South East of England and England as a whole since 2005 (see Table 4.1). Brighton & Hove has also seen a 16.4% reduction in the percentage of total emissions per capita between 2005 and 2012, higher than the reductions for the South East (15.9%), but lower than England (16.7%).

Table 4.1: Carbon dioxide emissions and sources, plus emissions per capita, 2005-2012²⁸

	Industrial and Commercial (t CO₂)	Domestic (t CO₂)	Transport (t CO₂)	Total (t CO₂)

²⁴ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via

<http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx> last accessed [04/04/17]

²⁵ Brighton & Hove City Council (2011) Preliminary Flood Risk Assessment Report [online] accessible via <<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Preliminary%20Flood%20Risk%20Assessment.pdf>> last accessed on [19/06/17]

²⁶ Brighton & Hove City Council (2014) Surface Water Management Plan [online] accessible via <<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Surface%20Water%20Management%20Plan.pdf>> last accessed on [19/06/2017]

²⁷ Brighton & Hove City Council (2012) Brighton and Hove Council Strategic Flood Risk Assessment [online] accessible via <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Strategic_Flood_Risk_Assessment_Jan_2012.pdf> last accessed on [19/06/17]

²⁸ Department of Energy and Climate Change (2011) Official statistics: Local Authority carbon dioxide emissions, UK local and regional CO₂ emissions: subset dataset (emissions within the scope of influence of Local Authorities) available at: <<https://www.gov.uk/government/publications/local-authority-emissions-estimates>> 2005 to 2012 accessed on [19/06/17]

	Industrial and Commercial (t CO ₂)	Domestic (t CO ₂)	Transport (t CO ₂)	Total (t CO ₂)
Brighton & Hove				
2005	1.8	2.4	1.4	5.5
2006	1.8	2.4	1.3	5.5
2007	1.7	2.3	1.3	5.3
2008	1.7	2.2	1.2	5.1
2009	1.5	2.0	1.2	4.6
2010	1.6	2.1	1.1	4.8
2011	1.3	1.8	1.1	4.2
2012	1.5	2.0	1.1	4.6
South East				
2005	2.5	2.6	1.8	6.9
2006	2.5	2.6	1.8	6.9
2007	2.4	2.5	1.8	6.7
2008	2.4	2.4	1.7	6.5
2009	2.1	2.2	1.6	5.9
2010	2.2	2.3	1.6	6.1
2011	2.0	2.0	1.5	5.6
2012	2.1	2.2	1.5	5.8
England				
2005	3.0	2.5	1.7	7.2
2006	3.0	2.5	1.7	7.2
2007	2.8	2.4	1.7	6.9
2008	2.7	2.4	1.6	6.7
2009	2.4	2.2	1.5	6.1
2010	2.5	2.3	1.5	6.3
2011	2.3	2.0	1.5	5.7
2012	2.4	2.2	1.4	6.0

Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team²⁹. UKCP09 gives climate information for the UK up to the

²⁹ The data was released on 18th June 2009: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [19/06/17]

end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South East of England by 2050 for a medium emissions scenario³⁰ are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.8°C; and
- The central estimate of change in winter mean precipitation is 16% and summer mean precipitation is -19%.

Resulting from these changes, a range of risks may exist for the HSNP area. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Defra announced in January 2016 that the UK Climate Projections will be updated following the Paris Agreement on Climate Change (December 2015).³¹

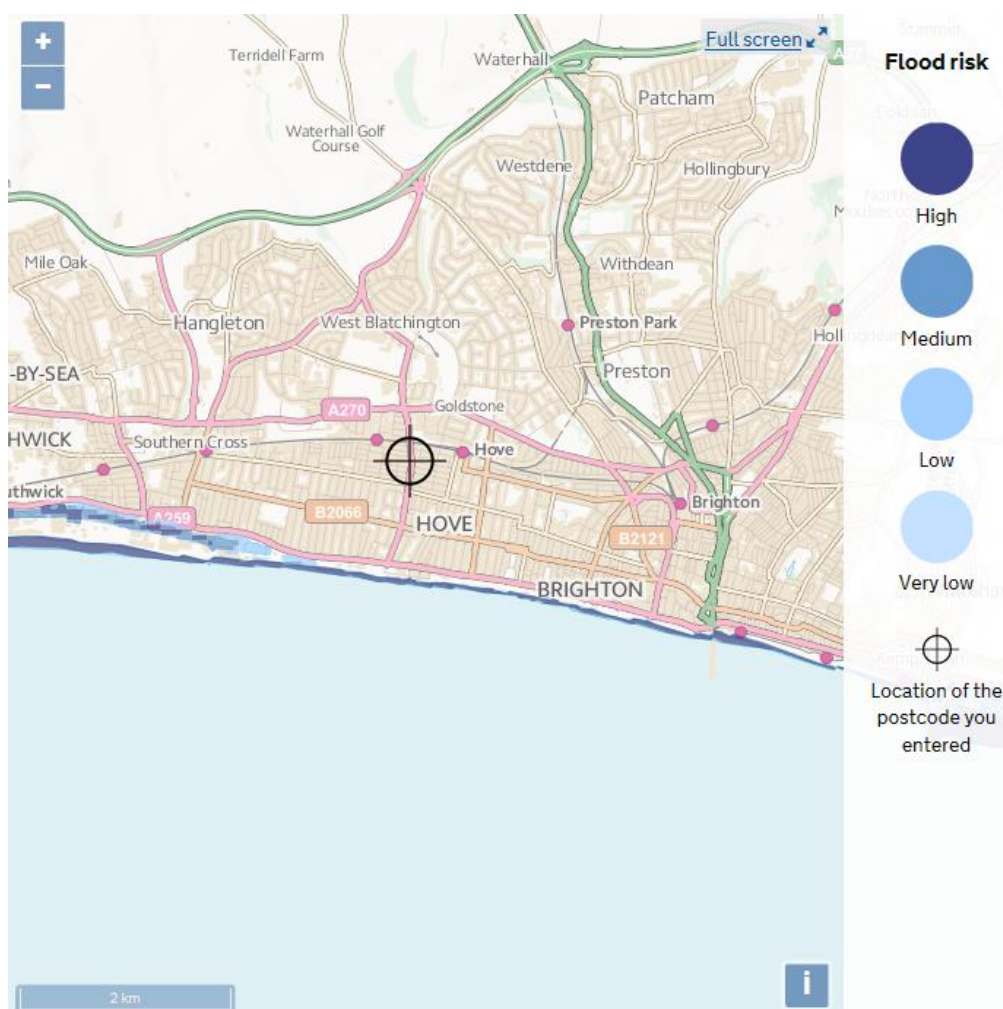
Flood Risk

As shown in **Figure 4.1**, land within the HSNP area is not at risk from fluvial flooding. This land is located within Flood Zone 1 (low risk of flooding), and it therefore classified as having less than 1 in 1000 probability of being affected by river or coastal flooding in any given year.

³⁰ UK Climate Projections (2009) South East 2050s Medium Emissions Scenario [online] available at: <http://ukclimateprojections.metoffice.gov.uk/23907?emission=medium> last accessed [19/06/17]

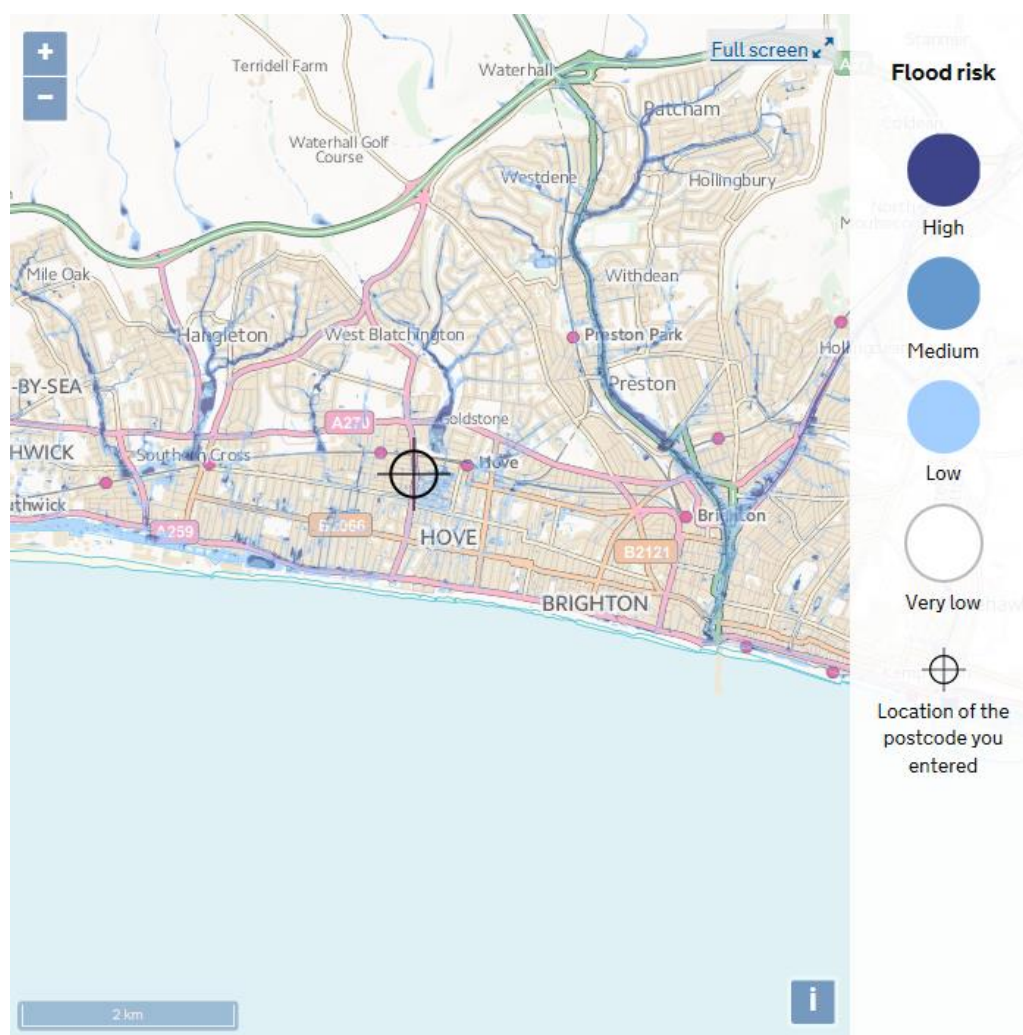
³¹ Met Office. UK Climate Projections - UKCP18 Project announcement [online] available at: <http://ukclimateprojections.metoffice.gov.uk/24125> last accessed [19/06/17]

Figure 4.1: Fluvial flood risk within the HSNP area³²



³² GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access from: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/> last accessed [19/06/17]

Figure 4.2: Surface water flood risk within the HSNP area³³



Surface Water drainage and sewer flooding is an issue some parts of the HSNP area, with areas at risk of surface water flooding, including around the Goldstone Retail Park area, and throughout the residential areas south of the railway line to the Blatchington Road area. There is a clear flow route through the area from the north (Hove Park) to the south (seafont).

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk causes flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Based on the information provided within the

³³ Ibid.

Surface Water Management Plan³⁴, published in 2014, none of the eight hotspots are located within the HSNP area.

Brighton & Hove City Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency)³⁵ within the HSNP area within the future but this is not known at this stage.

Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the HSNP area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

In terms of climate change mitigation, per capita emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. However, future development will expand in the built footprint of the HSNP area, which may lead to a future increase in overall emissions.

Objectives in the 2016 Brighton & Hove Local Plan, along with a variety of policies within the current Local Transport Plan (further discussed in Chapter 9), seek to increase the uptake of renewable energy and improve the provision of public and sustainable transport. The effective implementation of such policies has the potential to reduce future emissions within and surrounding the HSNP area.

Key Sustainability Issues

- There is a low-medium risk of coastal flooding and surface water drainage flooding within the HSNP area. This has the potential to increase as a result of climate change.
- Based on the information provided in the Surface Water Management Plan, published in 2012, there are no Critical Drainage Areas (CDAs) within the HSNP area due to the absence of any Local Flood Risk Zones (LFRZ).
- Brighton & Hove has recorded consistently lower greenhouse gas (GHG) emissions total per capita in comparison to the regional and national averages.

What are the SEA objectives and assessment questions for the Climate Change SEA theme?

SEA objective	Assessment Questions
Reduce the level of contribution to climate change made by activities within the HSNP area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding the required buildings standards? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the HSNP area to the potential	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that no inappropriate development takes place in areas at higher

³⁴ Brighton & Hove City Council (2014) Surface Water Management Plan [online] available to view via: <<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Surface%20Water%20Management%20Plan.pdf>>

³⁵ GOV.UK (2017): 'Flood Risk Assessment in Flood Zone 1 and Critical Drainage Areas', [online] available to view via: <<https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas>> last accessed [06/04/17]

effects of climate change, including flooding

risk of flooding, and ensure that sufficient mitigation is planned for development in areas at risk, taking the likely effects of climate change into account?

- Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?
 - Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?
 - Ensure the potential risks associated with climate change are considered through new development in the HSNP area?
 - Increase the resilience of biodiversity in the plan area to the effects of climate change by improving habitat extent, condition and connectivity?
-

4. Landscape and Historic Environment

Focus of Theme:

- Landscape and townscape character and quality
- Designated and non-designated sites and areas
- Setting of cultural heritage assets
- Archaeological assets

Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- Develop ‘robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics’.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt ‘proactive strategies’ to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government’s Statement on the Historic Environment for England³⁶ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

The adopted Brighton and Hove City Plan Part One (2016) seeks to promote the city’s heritage and to ensure that the historic environment plays an integral part in the wider social, cultural, economic and environmental future of the city through policy CP15 (Heritage).

Baseline Summary

Summary of Current Baseline

Landscape

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The HSNP area is located within the ‘South Coast Plain’ NCA, a narrow strip running along the Hampshire and Sussex coast from the edge of Southampton in

³⁶ HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx last accessed [19/06/17]

the west to Brighton & Hove in the east. The NCA profile for the 'South Coast Plain'³⁷ list a number of key characteristics, with the following of particular relevance to the HSNP area:

- The underlying geology of flinty marine and valley gravels extends for several miles inland to the dip slope of the South Downs and the South Hampshire Lowlands. This gives rise to deep and well-drained high-quality soils;
- The area has significant urban development, with settlements along the coastline dominated by the Portsmouth conurbation and suburban villages, linked by major road and rail systems.

Although outside of the Neighbourhood Plan Area, over 40% of Brighton & Hove is located within the boundary of the South Downs National Park (SDNP)³⁸. This land surrounds the built up area of the city, being managed as open space or farmed Downland. The landscape type here is defined as open Downland. It is a distinctive open landscape which is located on the Sandgate chalk formation.³⁹ The area's designation as a National Park recognises that it is a landscape of national importance, with features that create local distinctiveness, giving the landscape its unique sense of place.

In 2009, Brighton & Hove City Council undertook an Urban Characterisation Study which aims to *'provide a comprehensive 'evidence based' document that can provide a starting point for how future developments might contribute positively to the evolving urban character of the city'*.⁴⁰

The majority of the HSNP area is located in the 'Sackville' neighbourhood, and also partially within 'Wilbury' and the 'Central Conservation Areas' neighbourhoods.

Sackville

Sackville neighbourhood sits below the railway line, and borders central Hove. The area slopes down from the railway line, with grander houses along the main routes. Most of the neighbourhood is made up of low rise terraces.

Wilbury

Wilbury is a predominantly residential inner suburb located close to both Brighton & Hove town centres. It has good public transport links to its immediate surrounding as well as rail links to London and the towns and cities along the south coast.

Historic Environment

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms.

The HSNP area contains 1 Grade II* listed building which is the Church of St Barnabus; and approximately 27 Grade II listed buildings. There is no Grade I listed buildings, Scheduled Monuments, registered battlefields or registered historic parks and gardens within the HSNP area.

There are four Conservation Areas that fall within the Neighbourhood Area which cover approximately one quarter of the area of the Neighbourhood Area. These include:

- **Hove Station**⁴¹ - The special character of the area derives from the relationship between the station and the surrounding late Victorian buildings which connect the station with the main part of the town along Goldstone Villas. This is a busy, tree-lined road with terraced properties to the north and more domestic, lower scale property to the south.

³⁷ Natural England (2014): 'NCA Profile: 126 South Coast Plain (NE525)', [online] available to download via: <<http://publications.naturalengland.org.uk/publication/4923911250640896?category=587130>> last accessed [19/06/17]

³⁸ Brighton & Hove City Council (2016) Brighton & Hove City Plan Part One [online] available to access via: <<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one>> last accessed [26/10/17]

³⁹ South Downs National Park Authority (2011) South Downs Integrated Landscape Character Assessment: Sandy Arable Farmland [online] available to access via: <<https://www.southdowns.gov.uk/planning/planning-advice/landscape/>> last accessed [26/10/17]

⁴⁰ Brighton & Hove City Council (2009) The Urban Characterisation Study [online] available to access via: <<http://www.brighton-hove.gov.uk/content/planning/heritage/urban-characterisation-study>> last accessed [19/06/17]

⁴¹ Brighton & Hove City Council (2006) Hove Station Conservation Area Character Statement [online] available to access via: <http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_Hove_Station_Dec_2015.pdf> last accessed [19/06/17]

- **Denmark Villas**⁴² - The dominant character and appearance of Denmark Villas is its Italianate classicism, a feature reflected in the design of Hove station. The buildings are solid, but without the flamboyance and rich details of earlier houses in the area.
- **The Willett Estate**⁴³ - The character and appearance of the conservation area is derived in the main from large bay fronted, detached, semi-detached and terraced houses, set in spacious tree lined streets, behind walls with railings.
- **The Drive**⁴⁴ - The character and appearance of the Conservation Area is of large Victorian mansions with imposing entrances set well back behind low walls (some with their original distinctive render or terracotta pier caps) on either side of a tree-lined avenue leading down to the sea.

Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁴⁵. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, and scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. The 2016 Heritage at Risk Register for South East England⁴⁶ highlights that none of the heritage assets within the HSNP area are deemed to be at risk.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life - whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities.

Figure 5.1 shows the designated landscapes and historical sites located within and surrounding the HSNP area.

Summary of Future Baseline

New development has the potential to lead to small, but incremental changes in landscape and townscape character and quality in and around the HSNP area; for instance, through the redevelopment of brownfield land. However, new development need not be harmful to the significance of a heritage asset, and in the context of the HSNP area there is opportunity for new development to enhance the historic setting of the key features and areas and better reveal assets' cultural heritage significance.

⁴² Brighton & Hove City Council (2015) Denmark Villas Conservation Area Character Statement [online] available to access via: <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_Denmark_Villas_Dec_2015.pdf> last accessed [19/06/17]

⁴³ Brighton & Hove City Council (2015) The Willett Estate Conservation Area Character Statement [online] available to access via: <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_Willett_Estate_Dec_2015.pdf> last accessed [19/06/17]

⁴⁴ Brighton & Hove City Council (2015) The Drive Conservation Area Character Statement [online] available to access via: <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_The_Drive_Dec_2015.pdf> last accessed [19/06/17]

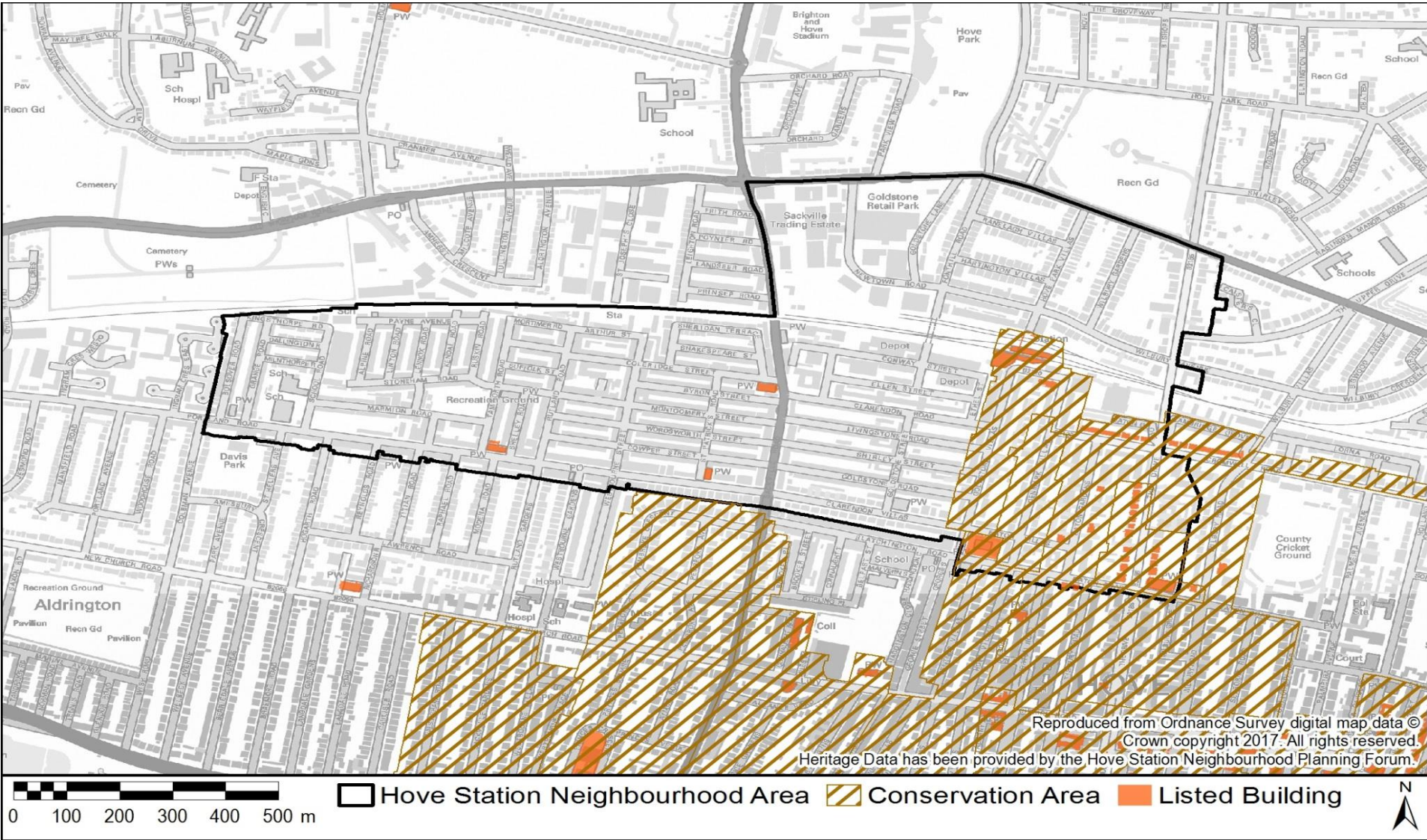
⁴⁵ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [19/06/17]

⁴⁶ Historic England (2016): 'Heritage at Risk 2016 Register – South East', [online] available to download via: <<https://www.historicengland.org.uk/images-books/publications/har-2016-registers/>> last accessed [19/06/17]

What are the SEA objectives and assessment questions for the Landscape and Historic Environment SEA theme?

SEA objective	Assessment Questions
Conserve and enhance the HSNP area's historic environment, heritage assets, and their settings.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the four Conservation Areas? • Conserve and enhance buildings and structures of architectural or historic interest? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment?
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance landscape and townscape features? • Support the integrity of the four Conservation Areas?

Figure 5.1: Historic Environment



5. Land, Soil and Water Resources

Focus of Theme:

- Soils resource
- Waste management
- Watercourses
- Water availability
- Water quality

Policy Context

The EU's Soil Thematic Strategy⁴⁷ presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁴⁸, which sets out a vision for soil use in England, and the Water White Paper⁴⁹, which sets out the

⁴⁷ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [19/06/17]

⁴⁸ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [19/06/17]

Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England⁵⁰ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The adopted Brighton and Hove City Plan Part One (2016) directs the majority of new development towards brownfield land within the city's built up area. Policy CP8 (Sustainable Buildings) aspires that all new development will move towards water neutrality by meeting high water efficiency standards and incorporating facilities to recycle, harvest and conserve water resources.

Baseline Summary

Summary of Current Baseline

Land Quality

The HSNP area does not have a history of heavy industrial land use. No recorded significant or major industrial pollution incidents have been recorded by the Environment Agency under the EC Integrated Pollution Prevention and Control Directive (IPCC)⁵¹. However, this does not preclude the potential for localised soil or groundwater contamination to be present, for example from existing or previous employment uses at certain sites within the HSNP area. There is no agricultural land within the HSNP area.

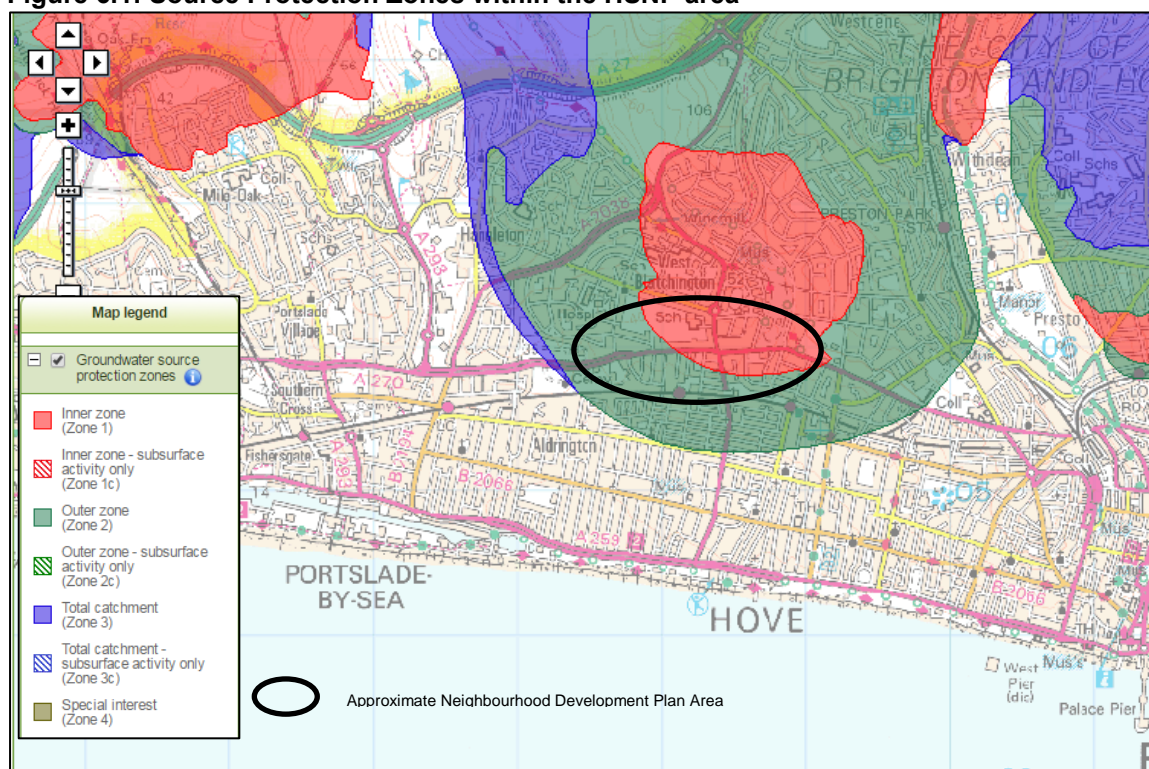
Watercourses

There are no watercourses present within the HSNP area. Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. There are parts of the HSNP area that are SPZs including the northern part of the HSNP area which are in Zone 1 (defined by a 50 day travel time from any point below the water table to the source) and Zone 2 (defined by a 400 day travel time from a point below the water table).

⁴⁹ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [19/06/17]

⁵⁰ Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [19/06/17]

⁵¹ Environment Agency Interactive Map: 'Pollution Incidents' [online] accessible via: <<http://apps.environment-agency.gov.uk/wiyby/default.aspx>> last accessed [19/06/17]

Figure 6.1: Source Protection Zones within the HSNP area⁵²

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs), and as such, they are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. NVZs for 2017-2020 started on January 1st 2017⁵³, including new areas of NVZs and excluding areas that have been de-designated. The entirety of the HSNP area is located within a Groundwater NVZ, defined as follows⁵⁴:

“Water held underground in the soil or in pores and crevices in rock, which has or could have if action is not taken, a nitrate concentration greater than 50mg/l”.

Summary of Future Baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates. There are likely to be no future issues in relation to waste management or minerals without implementation of the Neighbourhood Plan.

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies. The majority of the HSNP area is previously developed land so there will not be any future issues in relation to agricultural land. Remediation opportunities are likely to be available for any potential areas of contaminated land.

⁵² Environment Agency Interactive Map: 'Groundwater Source Protection Zones' [online] accessible via: <http://apps.environment-agency.gov.uk/wiyby/default.aspx> last accessed [19/06/17]

⁵³ GOV.UK (2017): 'Nutrient Management: Nitrate Vulnerable Zones' [online] available to access via:

<https://www.gov.uk/guidance/nutrient-management-nitrate-vulnerable-zones> last accessed [19/06/17]

⁵⁴ Environment Agency (2017): 'What's in your backyard? Nitrate Vulnerable Zones map', [online] available to view via: <http://apps.environment-agency.gov.uk/wiyby/141443.aspx> last accessed [19/06/17]

Key Sustainability Issues

- The HSNP area does not have a history of heavy industrial land use, with no significant or major pollution incidents recorded. However there may be some land contamination at certain sites within the HSNP area due to current or former uses.
- There are no areas of agricultural land within the HSNP area.
- The entirety of the HSNP area is designated as a Groundwater Nitrate Vulnerable Zone and Source Protection Zone.
- There are no watercourses flowing through the HSNP area.

What are the SEA objectives and assessment questions for the Land, Soil and Water Resources SEA theme?

SEA objective	Assessment Questions
Protect and enhance the water environment.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Avoid, or if this is not possible, minimise impacts on water quality and where possible, support improvements? • Minimise water consumption? • Protect groundwater resources?
Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the remediation of contaminated land? • Promote the use of previously developed land?

6. Population

Focus of Theme:

- Population size
- Population density
- Age structure
- Deprivation
- House prices and affordability
- Homelessness
- Education and skills

Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.

- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁵⁵ warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The adopted Brighton and Hove City Plan Part One (2016) seeks to meet the needs of the local population through the delivery of housing, employment and infrastructure.

Baseline Summary

Summary of Current Baseline

The HSNP area boundary contains seven Lower Super Output Areas (LSOAs): 016B, 016C, 016D, 019B, 019C, 019D and 019E. There is a small proportion of two other LSOAs that fall within the HSNP area but these have not been included in the pop figures. For the purposes of this Population and Community chapter, data from the aforementioned seven LSOAs have been presented and discussed. Therefore, future references to the HSNP area are inclusive of these seven LSOAs.

Population

Table 7.1: Population growth 2001-2011⁵⁶

Date	HSNP area	Brighton & Hove	South East	England
2001	10,669	247,817	8,000,645	49,138,831
2011	12,286	273,369	8,634,750	53,012,456
Population Change				
2001-2011	15.16%	10.31%	7.93%	7.88%

Between the years 2001 and 2011, the population of the HSNP area increased by 15.16% as shown in **Table 7.1**. These values broadly align with the increase for Brighton & Hove (10.31%), but are greater than the regional and national averages of 7.9%, respectively.

Age Structure

Table 7.2: Age Structure (2011)⁵⁷

	HSNP area	Brighton & Hove	South East	England
0-15	16.3%	16.2%	19.0%	18.9%
16-24	8.7%	15.9%	11.2%	11.9%
25-44	43.8%	32.4%	26.5%	27.5%

⁵⁵ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [19/06/17]

⁵⁶ ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

⁵⁷ ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

	HSNP area	Brighton & Hove	South East	England
45-59	16.3%	17.7%	19.9%	19.4%
60+	14.9%	17.7%	23.3%	22.3%
Total Population	12,286	273,369	8,634,750	53,012,456

Generally, there are fewer residents within the older age groups (45-59 and 60+) within the LSOAs covering sections of the HSNP area in comparison to the totals for the South East (43.2%) and England (41.7%), as shown in **Table 7.2**. However, the values for the HSNP area broadly align with the value for Brighton & Hove (35.4%), indicating that this might be a city-wide trend.

Household Deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation summarised below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Table 7.3: Relative household deprivation dimensions⁵⁸

	HSNP total area	Brighton & Hove	South East	England
Household not deprived	46.8%	43.0%	47.7%	42.5%
Deprived in 1 dimension	29.5%	32.9%	32.2%	32.7%
Deprived in 2 dimensions	17.1%	17.8%	16.0%	19.1%
Deprived in 3 dimensions	5.7%	5.5%	3.7%	5.1%
Deprived in 4 dimensions	0.9%	0.9%	0.4%	0.5%

Based on the information shown in **Table 7.3**, the percentage of households within the HSNP area which are not deprived is similar to the trend observed for Brighton & Hove and the South East.

Index of Multiple Deprivation

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights. The seven deprivation domains are as follows:

⁵⁸ ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 1. 'Geographical Barriers': relating to the physical proximity of local services
 2. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 3. 'Indoors Living Environment' measures the quality of housing.
 4. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardised geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalised into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales (see **Table 7.4**).

There are seven LSOAs that are either fully or partially in the HSNP area: Analysis of the data presented in **Table 7.4** below reveals the following inferences:

General Trends

LSOAs (wholly located) in the section of the HSNP area

- E01016990: Brighton & Hove 016B is mainly within the top 50% of most deprived deciles for most IMD categories, with the exception of education, skills and training, income deprivation affecting children index, children and young people sub-domain, and geographical barriers sub-domain which are within the least deprived deciles.
- E01016991: Brighton & Hove 016C is mainly in the top 50% of most deprived areas for most IMD categories, with the exception of education, skills and training, crime, barriers to housing and services, income deprivation affecting children index which are in the top 50% of least deprived deciles. Adult skills sub-domain and, geographical barriers sub-domain are in the top 10% of least deprived deciles.

- E01016996: Brighton & Hove 016D is mainly in the top 50% of least deprived areas for most IMD categories including income, employment, education, skills and training, health deprivation and disability, crime, barriers to housing, income deprivation affecting children index, adult skills sub-domain and geographical barriers sub-domain. This LSOA is within the top 20% of most deprived areas for living environment, indoors sub-domain and outdoors sub-domain.
- E01016871: Brighton & Hove 019B is mainly in the top 50% of most deprived deciles for most IMD categories (within the top 10% of most deprived deciles for Living Environment and Indoors sub-domain). In terms of least deprived deciles this LSOA is within the top 10% for Adult skills domain.
- E01016872: Brighton & Hove 019C is generally within the top 50% of most deprived deciles for all IMD categories (indoors sub-domain and living environment is within the top 10%). The categories which fall within the top 50% of least deprived deciles include income, education, skills and training, income deprivation affecting children index, adult skills sub-domain and geographical barriers sub-domain.
- E01016873: Brighton & Hove 019D is within the top 30% of most deprived deciles for IMD categories including: income, employment, education, skills and training, health deprivation and disability, living environment, income deprivation affecting older people, children and young people sub-domain, wider barriers sub-domain, indoors sub-domain and outdoors sub-domain. The categories within the top 50% of least deprived deciles include crime, adult skills sub-domain, and geographical barriers sub-domain.
- E01016878: Brighton & Hove 019E is mainly within the top 50% of least deprived deciles for all IMD categories (within the top 10% for Education, Skills and Training). The categories which fall into the top 50% most deprived deciles include health, deprivation and disability, barriers to housing and services, living environment, income deprivation affecting older people, wider barriers sub-domain, indoors sub-domain and outdoors sub-domain.

Table 7.4: Index of Multiple Deprivation 2015⁵⁹

LSOA	Overall IMD	Income	Employment	Education, Skills and Training	Health Deprivation and Disability	Crime	Barriers to Housing and Services	Living Environment	Income Deprivation Affecting Children Index	Income Deprivation Affecting Older People	Children and Young People Sub-domain	Adult Skills Sub-domain	Geographical Barriers Sub-domain	Wider Barriers Sub-domain	Indoors Sub-domain	Outdoors Sub-domain
E01016990: Brighton & Hove 016B																
Rank	14,188	14,237	12,992	24,794	10,015	16,055	14,883	5,987	21,682	4561	20,346	27,963	29,433	5254	7,471	4,692
Decile	(5)	(5)	(4)	(8)	(4)	(5)	(5)	(2)	(7)	(2)	(7)	(9)	(9)	(2)	(3)	(2)
E01016991: Brighton & Hove 016C																
Rank	14,262	16,303	16,139	21,942	8276	19,040	17,119	2,934	17,374	9527	15,133	29,578	31,658	5759	3,707	4,370
Decile	(5)	(5)	(5)	(7)	(3)	(6)	(6)	(1)	(6)	(3)	(5)	(10)	(10)	(2)	(2)	(2)
E01016996: Brighton & Hove 016D																
Rank	18,984	17,926	19,956	19,169	18,018	23,857	19,982	5,080	21,070	13,392	11,514	29,756	27,653	8,221	5,661	5,830
Decile	(6)	(6)	(7)	(6)	(6)	(8)	(7)	(2)	(7)	(5)	(4)	(10)	(9)	(3)	(2)	(2)

⁵⁹ DCLG (2015): 'English Indices of Deprivation', [online] available to download from: <<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>> last accessed [19/06/17]

LSOA	Overall IMD	Income	Employment	Education, Skills and Training	Health Deprivation and Disability	Crime	Barriers to Housing and Services	Living Environment	Income Deprivation Affecting Children Index	Income Deprivation Affecting Older People	Children and Young People Sub-domain	Adult Skills Sub-domain	Geographical Barriers Sub-domain	Wider Barriers Sub-domain	Indoors Sub-domain	Outdoors Sub-domain
E01016871: Brighton & Hove 019B																
Rank	11,144	11,036	15,391	18,654	9072	22,340	9,955	1,390	15,723	4689	10,967	29,702	28,896	3475	1,770	5,045
Decile	(4)	(4)	(5)	(6)	(3)	(7)	(4)	(1)	(5)	(2)	(4)	(10)	(9)	(2)	(1)	(2)
E01016872: Brighton & Hove 019C																
Rank	12,835	16,684	16,241	17,902	15,152	15,213	15,339	604	17,950	8,405	10,384	28,870	32,067	4,972	1,126	3,779
Decile	(4)	(6)	(5)	(6)	(5)	(5)	(5)	(1)	(6)	(3)	(4)	(9)	(10)	(2)	(1)	(2)
E01016873: Brighton & Hove 019D																
Rank	6094	7997	7890	9620	2236	18,225	11,795	1,663	10,750	1,795	3,108	28,066	29,955	3,988	2,349	3,963
Decile	(2)	(3)	(3)	(3)	(1)	(6)	(4)	(2)	(4)	(1)	(1)	(9)	(10)	(2)	(1)	(2)
E01016878: Brighton & Hove 019E																

LSOA	Overall IMD	Income	Employment	Education, Skills and Training	Health Deprivation and Disability	Crime	Barriers to Housing and Services	Living Environment	Income Deprivation Affecting Children Index	Income Deprivation Affecting Older People	Children and Young People Sub-domain	Adult Skills Sub-domain	Geographical Barriers Sub-domain	Wider Barriers Sub-domain	Indoors Sub-domain	Outdoors Sub-domain
Rank	17,770	17,962	18,286	30,431	12,279	22,531	10,613	6,233	22,254	9,298	28,340	30,682	22,637	4,841	7,122	5,649
Decile	(6)	(6)	(6)	(10)	(4)	(7)	(4)	(2)	(7)	(3)	(9)	(10)	(7)	(2)	(3)	(2)

Similarities between the LSOAs

Poor performance (top 30% most deprived deciles)

- Other than E01016873 Brighton & Hove 019D, the remaining six LSOAs within the HSNP area are located within the top 30% most deprived deciles for the Income Deprivation Affecting Older People category.
- All LSOAs are located within the top 30% most deprived deciles for IMD categories including living environment, wider barriers sub-domain, indoors sub-domain and outdoors sub-domain.

Good performance (top 30% least deprived deciles)

- All LSOAs within the Neighbourhood Plan are located within the top 20% least deprived deciles for the adult skills sub-domain.
- All LSOAs with the exception of E01016878: Brighton & Hove 019E are located within the top 20% least deprived deciles for the geographical barriers sub-domain category.

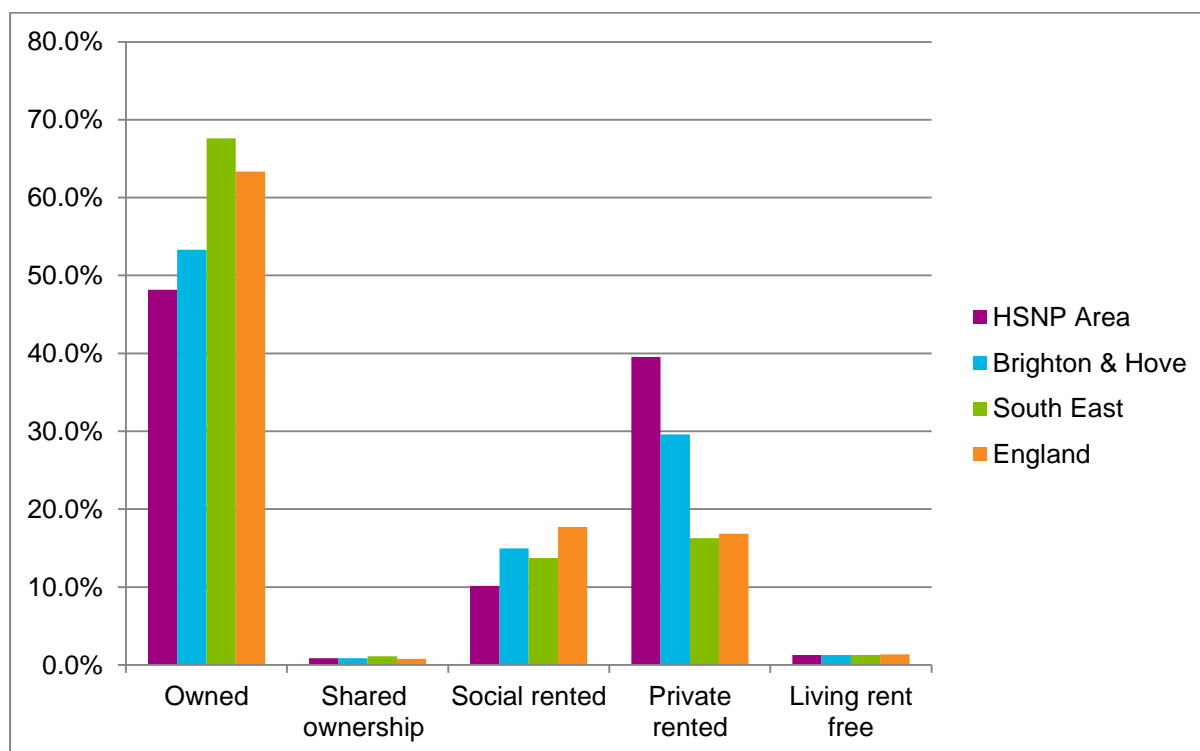
Contrasts between the LSOAs

- All of the LSOAs are within the top 50% most deprived deciles overall with the exception of E01016996: Brighton & Hove 016D and E01016878: Brighton & Hove 019E.
- All of the LSOAs are within the top 50% least deprived deciles for education, skills and training with the exception of E01016873: Brighton & Hove 019D which is ranked as being in the top 30% of most deprived deciles.

Housing Tenure

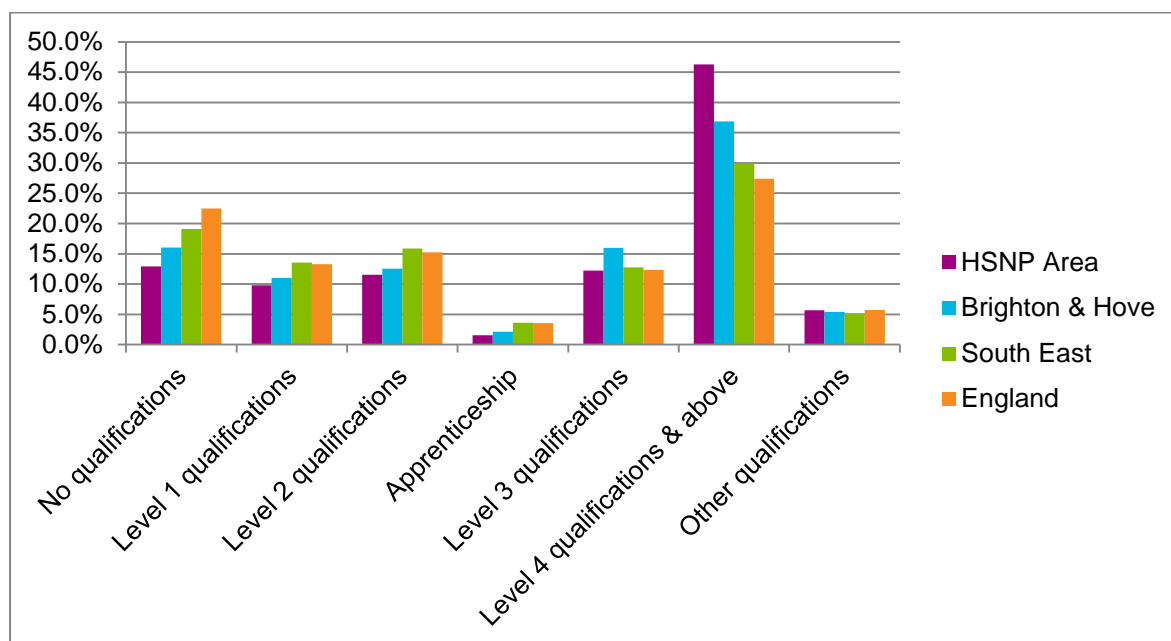
Within the HSNP area, 48.2% of residents either own their home outright or with a mortgage, compared to 53.3% for Brighton & Hove. These values are less than the value for the South East and England as shown in **Figure 7.1**. Additionally, a higher percentage of residents within HSNP area and Brighton & Hove privately rent their households in comparison to the totals for the South East, and England.

Figure 7.1: 'Tenure by Household' ⁶⁰



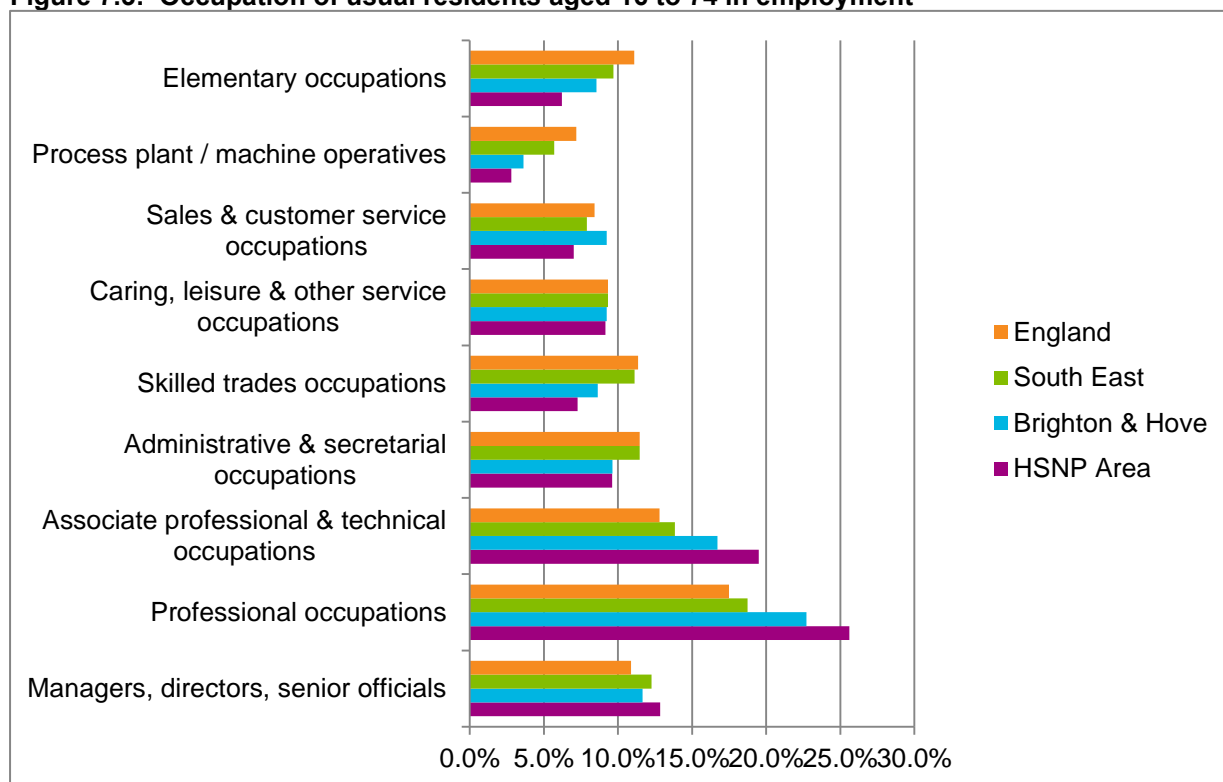
Education

⁶⁰ ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

Figure 7.2: 'Highest level of Qualification' ⁶¹

Within HSNP area 34% of the population either have no qualifications, a Level 1 qualification or a Level 2 qualification as their highest, in comparison to the totals for Brighton & Hove 39.6% and the South East 48.5%. Comparatively, 58.5% of the population of HSNP area have a Level 3 qualification or a Level 4 qualification as their highest, which is greater than the total for Brighton & Hove (52.8%). In general terms, the qualification values across all categories for the South East broadly match the values for England. However, there are contrasts within Brighton & Hove and the HSNP area as shown in **Figure 7.2**.

Employment

Figure 7.3: 'Occupation of usual residents aged 16 to 74 in employment' ⁶²

⁶¹ ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

⁶² ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

With regard to employment within the HSNP area, the following three occupations support the most residents:

- Professional occupations;
- Associate professional and technical occupations; and
- Managers, directors, senior officials.

Generally, there are more residents within the HSNP area employed as managers, directors and senior officials, professional occupations or in associate professional and technical occupations, in comparison to the Brighton & Hove, regional and national averages. The opposite trend is observed for those residents employed within all other occupations with the exception of caring, leisure & other service occupations in which HSNP area is in the line with national, regional and local averages as shown in **Figure 7.3**.

Summary of Future Baseline

The population of the HSNP area increased at a greater rate between the years 2001-2011 in comparison to the local, regional and national comparators. There are fewer residents within older age categories within the HSNP area, with the largest proportion of people aged between 25 - 44⁶³. The suitability of future housing for local requirements depends in part on the successful implementation of policies outlined in the Brighton & Hove Local Plan. Development within the HSNP area has the potential to stimulate future population growth.

Key Sustainability Issues

- Based on the most recent census data available, the population increase within the HSNP area has been higher than in Brighton & Hove, the South East and England.
- Fewer residents within the HSNP area are within the older age categories (45-59 and 60+), in comparison to the regional and national trends.
- There are seven Lower Super Output Areas (LSOAs) located wholly or partly within the HSNP area, five of which are located in top 50% most deprived deciles for the 'Overall Index of Multiple Deprivation' domain.
- At the local level, a notably higher percentage of residents in the HSNP area are employed within professional occupations in comparison to Brighton & Hove, the South East and England.
- Within the HSNP area, 48.2% of residents either own their home outright or have a mortgage, compared to 53.3% for Brighton & Hove. These values are lower than the values for the South East and England. A large proportion of residents (49.7%) within HSNP area either socially rent or privately rent their households in comparison to the totals for the Brighton & Hove (44.5%), the South East (30%), and England (34.5%).

⁶³ ONS (no date): 'Age Structure, 2001' Table KS02; ONS (no date): 'Age Structure, 2011' Table KS102EW

What are the SEA objectives and assessment questions for the Population and Community SEA theme?

SEA objective	Assessment Questions
Cater for existing and future residents' needs as well as the needs of different groups in the community.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Meet the housing and employment needs for all members of the community?
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Encourage and promote local employment and training opportunities? • Promote the development of a range of high quality, accessible community facilities and local services? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing local residents?

7. Health and wellbeing

Focus of Theme:

- Health indicators and deprivation
- Influences on health and well-being

1.1 Policy Context

Key messages from the NPPF include:

- The social role of the planning system involves ‘supporting vibrant and healthy communities’.
- A core planning principle is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities’
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages, Fair Society, Healthy Lives⁶⁴ (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving Local Authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

Published in 2013, the Joint Strategic Needs Assessment⁶⁵ (JSNA) for Brighton & Hove describes the current and future wellbeing, health and care needs of local communities, in addition to informing the priorities and work-streams of the Joint Health and Wellbeing Strategy⁶⁶ (JHWS). There are five priority areas addressed in both the JSNA and JHWS listed below:

- Priority 1: Cancer and access to cancer screening
- Priority 2: Dementia
- Priority 3: Emotional health and wellbeing (including mental health)
- Priority 4: Healthy weight and good nutrition
- Priority 5: Smoking

⁶⁴ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <<http://www.apho.org.uk/resource/item.aspx?RID=106106>> last accessed [19/06/17]

⁶⁵ Brighton & Hove City Council (2013): Joint Strategic Needs Assessment Update, [online] available to download via: <<http://www.bhconnected.org.uk/content/jsna-update-page>> last accessed [19/06/17]

⁶⁶ Brighton & Hove City Council (2016): ‘Joint Health and Wellbeing Strategy’, [online] available to download at: <<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Joint%20Health%20and%20Wellbeing%20Strategy.pdf>> last accessed [19/06/17]

The adopted Brighton and Hove City Plan Part One (2016) seeks to protect and enhance access to open space and sports facilities, reduce health inequalities and promote healthy lifestyles. The plan addresses this through policies CP16 (Open Space), CP17 (Sports Provision) and CP18 (Healthy City) respectively.

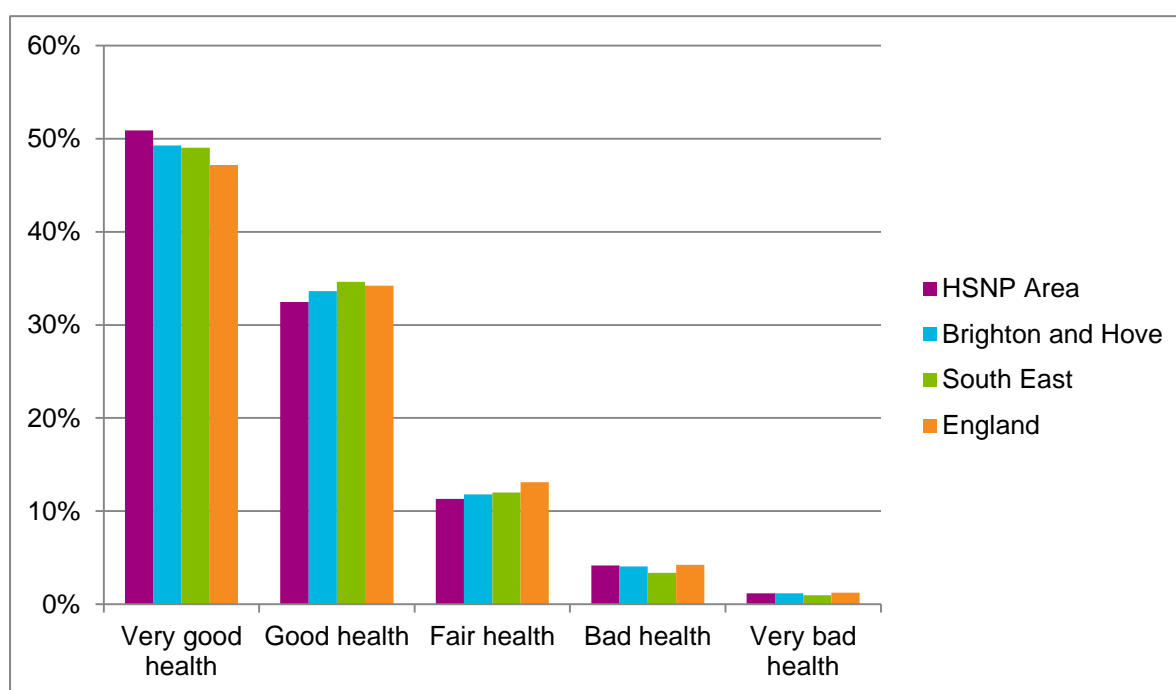
1.2 Baseline Summary

1.2.1 Summary of Current Baseline

Health Indicators and Deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in **Chapter 7**. As highlighted in Figure 8.1, 83.3% of residents consider themselves as having 'very good health' or 'good health', broadly aligning with the totals for Brighton & Hove, the South East and England (all over 80%). 5.3% of residents in HSNP area report 'bad health' or 'very bad health', aligning to comparators.

Figure 8.1: 'General Health'⁶⁷



The high percentage totals of 'very good health' and 'good health' for the HSNP area observed in **Figure 8.1** aligns with the disability data presented in **Table 8.1**. Across the HSNP area 84.5% of residents state that their daily activities are 'not limited', broadly aligning with the trends for Brighton & Hove (83.7%), the South East (84.3%), and England (82.4%).

Table 8.1: Disability⁶⁸

	HSNP area	Brighton & Hove	South East	England
Day-to-day activities limited a lot	7.5%	7.5%	6.9%	8.3%

⁶⁷ ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

⁶⁸ ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

Day-to-day activities limited a little	8.1%	8.8%	8.8%	9.3%
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Day-to-day activities not limited	84.5%	83.7%	84.3%	82.4%
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Summary of Future Baseline

Broadly speaking, the health and well-being within the HSNP area is very good in comparison with the regional and national averages. Future increases in the built-up area have the potential to increase traffic along the main routes into Brighton.

The current Joint Health and Wellbeing Strategy will end in 2020, and Brighton & Hove's Health and Wellbeing Board will need to consider how to best develop a new strategy, moving forward. Key issues for health and social care from the JSNA are grouped into the following key priority themes, providing a point of reference for the future strategy:

- Reducing inequalities across Brighton & Hove;
- Safe, healthy, happy children, young people and families;
- Give every person the chance of living and ageing well;
- Develop healthy and sustainable communities and neighbourhoods; and
- Providing better care through integrated services.

Key Sustainability Issues

- The majority of residents within the HSNP area consider themselves to have 'very good health' or 'good health', broadly aligning to the totals for Brighton & Hove, the South East of England, and England.
- Future increases in the built-up sections of the HSNP area have the potential to increase traffic along the main routes into the city centre. This has the potential to impact both air quality and the health and wellbeing of residents.

What are the SEA objectives and assessment questions for the Health and Wellbeing SEA theme?

SEA objective	Assessment Questions
Improve the health and wellbeing residents within the HSNP area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Align to the five key priority areas outlined in the Joint Strategic Needs Assessment? • Provide and enhance the provision of community access to green infrastructure and open space, in accordance with City Plan Part 1 policy CP6 (Open Space)? • Reduce noise pollution? • Promote the use of healthier modes of travel? • Facilitate access to the community and services for people with protected characteristics including disabled and older people?

8. Transportation

Focus of Theme:

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility
- Car ownership
- Travel to work

Policy Context

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Brighton & Hove City Council's fourth Local Transport Plan 'LTP4' was adopted in 2015 and sets out how the transport challenges within both Brighton & Hove and the wider Greater Brighton City Region area will be tackled and improved up until the year 2030. The LTP4 outlines seven strategic objectives, which are summarised below⁶⁹:

- **Economy** – Ensure transport and travel contribute to the delivery of sustainable economic growth
- **Carbon Reduction** – Reduce transport emissions that affect climate change and our local environment
- **Safety & Security** – Create streets and neighbourhoods that are safe and welcoming for people to move around and use socially
- **Equality, Mobility and Accessibility** – Create an accessible and inclusive transport system for everyone
- **Health & Well-being** – Encourage and enable healthy and active travel choices
- **Public Realm** – Design and create places that are inviting and attractive and enhance people's quality of life and regenerate the city
- **Respect & Responsibility** – Increase people's awareness of others and change attitudes and behaviour when using the city's transport system.

The adopted Brighton and Hove City Plan Part One (2016) seeks to provide an integrated, safe and sustainable transport system that will accommodate new development; support the city's role as a sub-regional service and employment hub; and improve accessibility (Policy CP9).

⁶⁹ Brighton & Hove City Council (2015): 'Local Transport Plan 4', [online] available to access via: <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/BHCC%20Local%20Transport%20Plan%204%20Document%20v260515.pdf> [last accessed 16/06/17]

Baseline Summary

Summary of Current Baseline

Rail Network

There are two railway stations located in the HSNP area; these are Hove Station and Aldrington Station. Hove Station is part of the west coast mainline, with links to Brighton, London and the West Coast. Aldrington Station is also connected to coastal routes linking Brighton to Southampton.

The majority of direct services to the capital from Hove Station terminate at London Victoria station, with regular daily services (two per hour) taking approximately one hour.

Furthermore, there are direct services to regional and national destinations including Brighton from Aldrington Station, and Portsmouth Harbour, Brighton and Southampton from Hove Station, with the regularity and journey times listed below. Destination: Brighton; Regularity: two services per hour (two of which are direct); Journey time: approximately one and a quarter hours.

Aldrington Station

- Destination: Brighton; Regularity: two services per hour; Journey time: approximately 10 minutes

Hove Station

- Destination: Portsmouth Harbour; Regularity: hourly service; Journey time: approximately one and a quarter hours.
- Destination: Brighton; Regularity: six services per hour; Journey time: approximately 5 minutes
- Destination: Southampton; Regularity: hourly service; Journey time: approximately 2 hours
- Destination: London Victoria; Regularity: two services per hour; Journey time: approximately one hour and five minutes

Bus Network

In regards to the bus network, there are a variety of services navigating through the HSNP area, connecting residents to the city centre of Brighton as well as other locations throughout the city. The following services (operated by First Bus and BH Bus Company) travel regularly through the area, stopping along the following main streets, amongst others⁷⁰:

- Old Shoreham Road: Route 56
- Sackville Road: Routes 5, 5A, and 5B
- Portland Road: Routes 2, 46, and 49
- Goldstone Villas: Route 7

Road Network and Congestion

The A2070 and the A203 pass along the northern boundary of the HSNP area, and through the centre of the neighbourhood plan respectively, which provide connections to a network of A Roads navigating around Brighton. Locally, traffic issues exist along Portland Road, Sackville Road, Fronthill Road, Blatchington Road and The Drive.

Cycle and Footpath Network

Route 82 of the National Cycle Network⁷¹ navigates along the eastern boundary of the HSNP area which connects Brighton to the coastline.

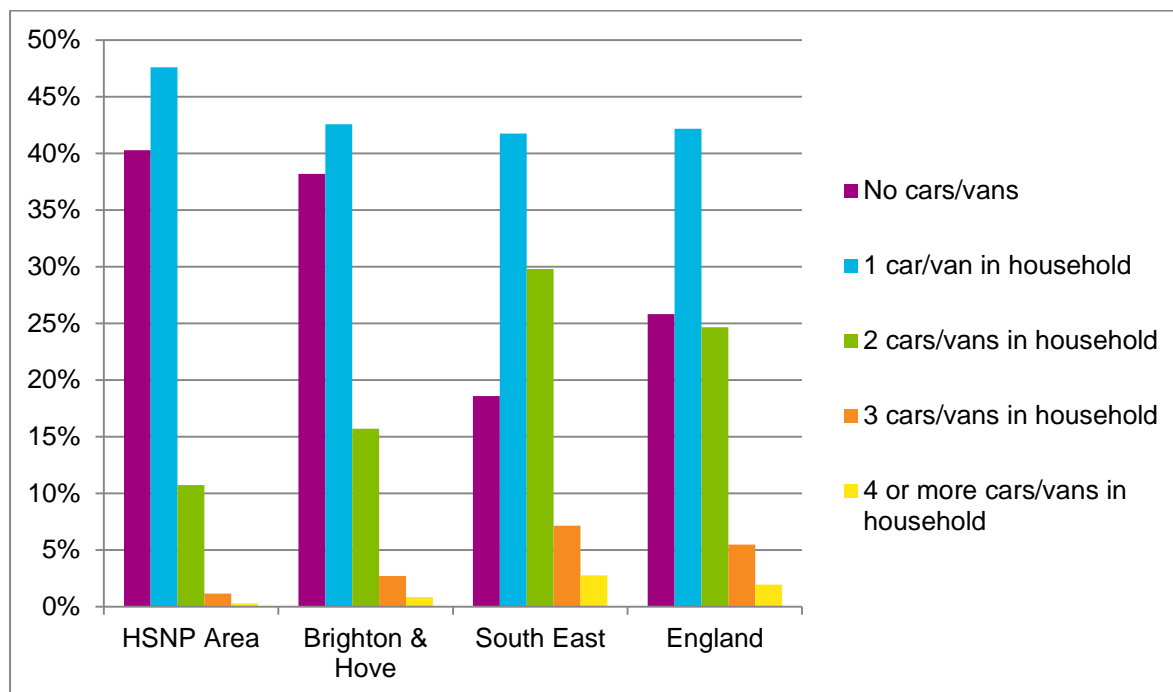
⁷⁰ Brighton & Hove Network Maps (2017) [online] available to access via: <<http://www.buses.co.uk/page.shtml?pageid=1306>> last accessed [19/06/17]

⁷¹ Sustrans (2017): 'National Cycle Network Map', [online] available to view via: <<http://www.sustrans.org.uk/ncn/map>> last accessed [19/06/17]

Availability of Cars and Vans

Figure 9.1 highlights the availability of cars and vans within HSNP area. The proportion of households with no access to a car or van is 40% for HSNP area. These values broadly align with value for Brighton & Hove (38%), more than the average for the South East (19%) and England (26%).

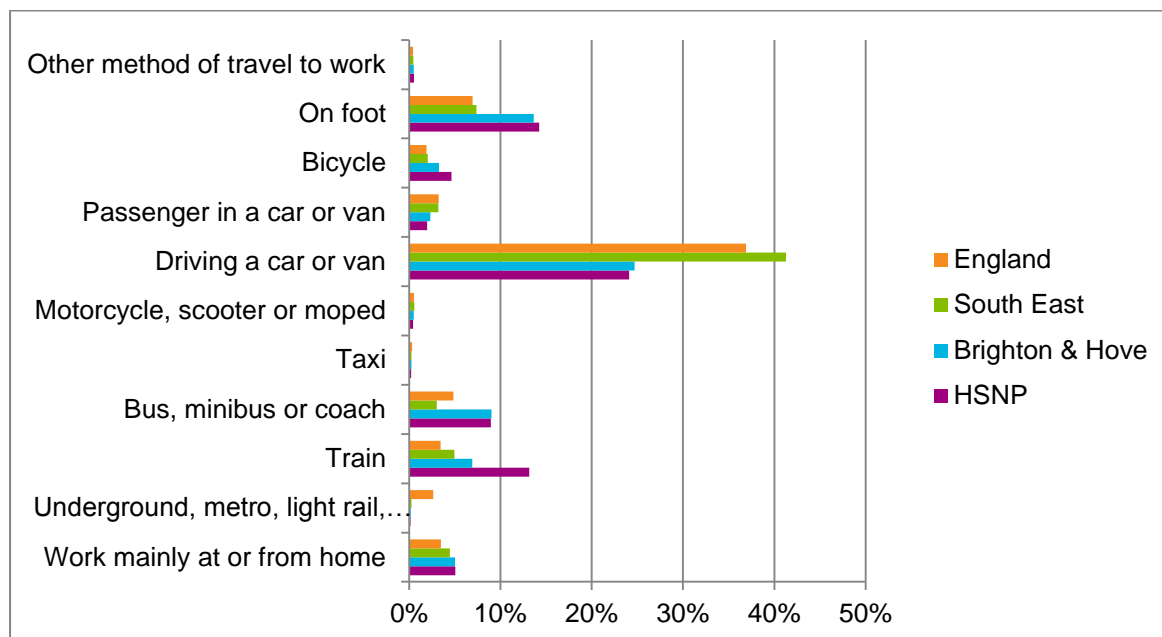
Figure 9.1: 'Car and van ownership'⁷²



Travel to Work

Figure 9.2 illustrates the method of travelling to work. Based on the most recent census data, the most popular method of travelling to work in the HSNP area is driving a car or van (24%), which is similar to the values for Brighton & Hove (25%) and less than the figure for England (37%). The second most popular method of travelling to work within the HSNP area is on foot (14%). These values are the same as Brighton & Hove (14%), but broadly align to the regional and national values: 7% and 7% respectively. Train is also a popular method of travelling to work with 13% of people travelling by train in the HSNP area. This is a larger proportion of the population compared to local, regional and national values which are 7%, 5% and 3% respectively.

⁷² ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

Figure 9.2: 'Method of Travel to Work'⁷³

Summary of Future Baseline

Over 59% of residents within the HSNP area have access to either one or two cars or vans, with these modes of transport the most popular choice for travelling to work. Redevelopment within the HSNP area has the potential to increase traffic but also offers opportunities to improve access to sustainable modes of transport. A number of goals within the 2015 Local Transport Plan (LTP4) aim to increase the use of public transport, with a view to reducing traffic on the existing highways network, helping to manage any increases in capacity due to future development.

Key Sustainability Issues

- There are two railway stations located within the HSNP area, Hove Station and Aldrington.
- There are a number of bus routes which navigate through the HSNP area into Brighton City Centre as well as other locations throughout the city, including Route 56, Route 5, and Route 2.
- The A203 and A2070 navigate through the HSNP area, with connections to a wider network of A Roads navigating around Brighton.
- The main congestion points within the HSNP area are along Portland Road, Sackville Road, Fronthill Road, Blatchington Road and The Drive.
- Route 82 of the National Cycle Network navigates along the eastern boundary of the HSNP area which connects Brighton to the coastline.

⁷³ ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

