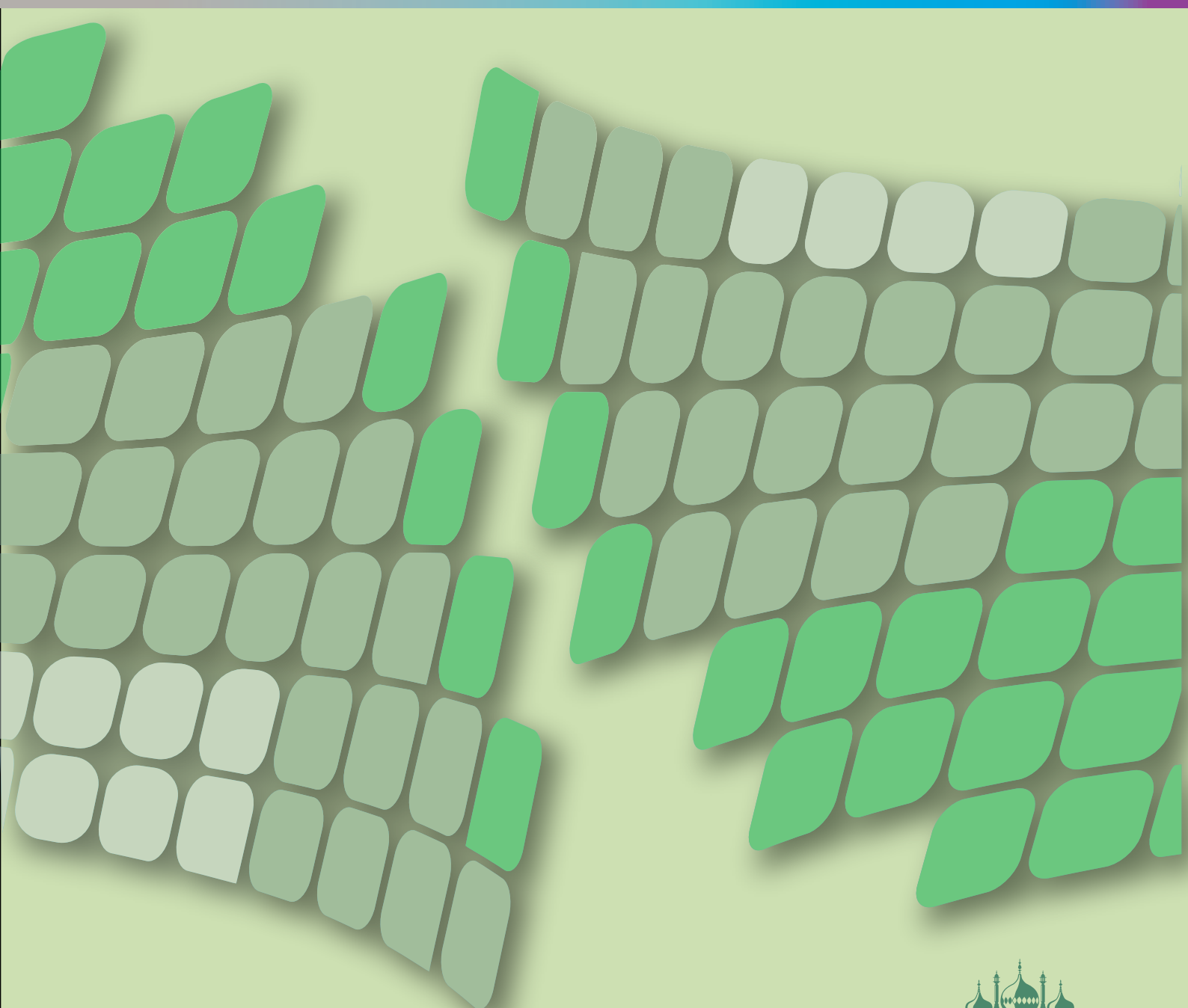


Sustainability Appraisal of the Core Strategy

Summary

September 2006

Brighton & Hove City Council's Local Development Framework



Brighton & Hove

Overview

Brighton and Hove City Council are currently preparing the Local Development Framework (LDF); the LDF will replace the Brighton and Hove Local Plan. The LDF must undergo a Sustainability Appraisal; this involves the production of a Scoping Report followed by a Sustainability Appraisal Report (SA).

The Planning and Compulsory Purchase Act (2004) requires that a Local Development Framework (LDF) replace the Brighton and Hove Local Plan. This is essentially a collection of Local Development Documents (LD) containing policies and proposals to guide future development in the City.

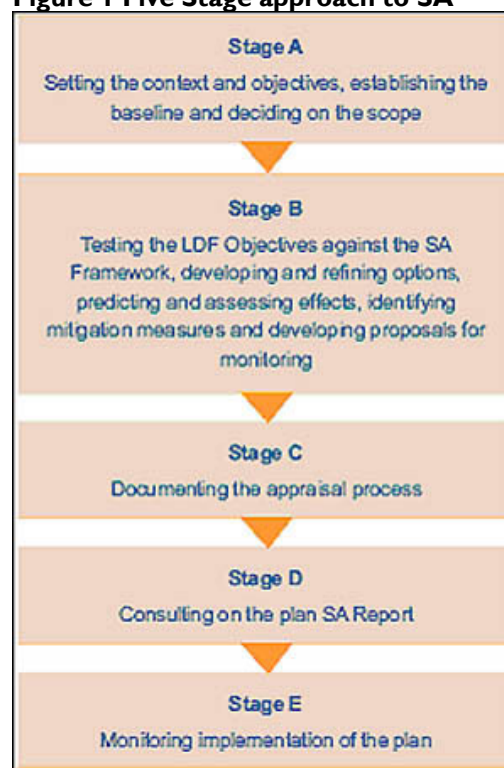
A Key LDD is the Core Strategy, as part of producing the Core Strategy; the City Council has generated a series of growth options for future spatial development in the City, and a series of policy options. A sustainability appraisal has been carried out by Brighton and Hove City Council to determine the economic, social and environmental implications of these options. This report summarises the findings of the options appraisal and the City Council are committed to taking this report into account in formulating the LDF.

The Sustainability Appraisal Report (SA) will play an important part in demonstrating if a Local Development Document is sound by ensuring that it reflects sustainability objectives. The results of the sustainability appraisal will contribute to the reasoned justification of policies.

The approach adopted for the Sustainability Appraisal Report follows

Government guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (Guidance for Regional Planning Bodies and Local Planning Authorities November 2005). This SA guidance from ODPM (2005) comprises five main stages. The SA process works in parallel with the preparation of the LDD and links across at all stages.

Figure 1 Five Stage approach to SA



Below are the five principles that the UK Government, will use to help achieve sustainable development.

1. Living Within Environmental Limits
2. Ensuring a Strong, Healthy and Just Society
3. Achieving a Sustainable Economy
4. Using Sound Science Responsibly
5. Promoting Good Governance

A Spatial Portrait of Brighton and Hove

Below is a summary of the spatial portrait of the City as set out in the Core Strategy.

Brighton and Hove is a compact city of 8,267 hectares built on rolling hills and valleys and constrained between the South Downs and the sea; 251,500 people live in the built up area that comprises roughly half of the city's extent. The population has been rising steadily for some time and is forecast to continue rising due to increasing life expectancy, the number of births exceeding the number of deaths and the fact that the city is a net importer of people. In addition, the population figure does not take into account the many tourists, conference delegates and language students who will be in the city at any one given time.

Brighton and Hove is a city of distinct urban neighbourhoods, where streets are human in scale and buildings are generally low rise, except for some tall buildings in the city centre and a few isolated tower blocks. Unlike cities or large towns with a significant industrial legacy, vacant or derelict land in Brighton and Hove is comparatively small in scale.

Within the South East, Brighton and Hove is a regional centre for shopping and employment and a sub-regional centre for health services. Recent trends have seen the retail focus of this centre shift eastwards. There are also two town centres (Hove and London Road) and four district centres. The city has a significantly greater number of shops than other cities of similar size

and a reputation for specialist and independent traders, notably in the North Laine area. The city accommodates two growing universities within its boundary, hosting roughly 32,000 students.

In recent years the Sussex County Hospital has expanded as services have been centralised there while smaller hospital sites elsewhere in the city have closed. Brighton and Hove is a historic city, known internationally for its extensive Regency and Victorian architecture, many listed buildings, including the famous Royal Pavilion. It is a cultural city with a strong commitment to the arts. The cultural focus has been given added impetus in recent years with the extensive restoration and modernisation of the Dome venue and Brighton Museum and the opening of the new central Jubilee Library. Brighton and Hove is also, of course, a seaside city, with 11km of seafront entertainment and leisure activities. Substantial public and private investment over the last decade has transformed the seafront between the piers. Furthermore, Brighton and Hove is a major European conference centre. The city now attracts 8 million visitors a year, bringing in £380m into the local economy annually and supporting over 20,000 jobs. These figures are expected to grow over the next twenty years.

Sustainability Issues Facing Brighton and Hove

The Scoping Report for the Core Strategy was sent out for consultation in October 2005, The following comments were received from the Environment Agency: *“It is unclear what the actual sustainability issues are. We therefore suggest that the Section be revised to specifically highlight this information For example the following issues are of significant concern to Brighton and Hove: Water Resources and Infrastructure.”*

This section has therefore been revised and included in full in the Sustainability Appraisal Report.

Socio-economic aspects

Demographically Brighton & Hove has much higher proportions than nationally of 20 - 44 year olds, single people, and professionals. The City has much lower proportions of skilled manual workers, children and married people than the national average.

Employment

The city exports more workers than it attracts, those out-commuting are more likely to travel northwards to higher wage areas, Those in commuting ARE more likely to commute from lower wage areas along the Sussex coast. High levels of travel to and from the city increase pressure on the transport infrastructure in and around the city. Long-term economic sustainability is only likely to be achieved by developing high value added businesses locally that will retain higher skilled workers.

(Brighton and Hove Economic Strategy 2005-2008)

Health

Brighton & Hove, South Downs, Mid Sussex Primary Care Trusts, the Hospital Trusts, and Sussex Ambulance Trust, have recently carried out a number of capacity assessments along with proposals for the future provision of services.

In November 2004 these organisations jointly produced a public consultation document entitled “Best Care, Best Place” which sets out proposals for the future of hospital services over the next ten years in their area.

Biodiversity

The Biodiversity Action Plan (BAP) began in Sussex in 1996, when the Sussex Biodiversity Partnership was established. Reflecting the essentially rural nature of the County, the Sussex BAP partnership comprises nature conservation organisations, local authorities and local landowner interests. Brighton & Hove City Council joined the Partnership in 1997.

The Sussex BAP comprises several habitats and Species Action Plans (SAP) addressing threatened habitats and species such as chalk grassland, hedgerows, floodplain grasslands, skylark, barn owl and brown hare.

Brighton & Hove will develop its own Biodiversity Action Plan to:

- Ensure the City plays its part in achieving the targets of the Sussex-wide Urban BAP
- Make sure local interests and values are fully taken into account

Leisure and Open Space

The Open Space Study is still an emerging document and firm conclusions cannot yet be made. However, using the initial information to take a general view, it would appear that the city has a reasonable amount of open space for the population it currently serves but not for the population predicted for 2026. The council's draft Biodiversity Strategy recommends a city-wide Green Infrastructure Network (GIN), a multi-functional network of nature reserves, green spaces and greenway linkages operating at all scales from urban centres through to open countryside.

Utilities General

The National Policy Guidance PPS12 states "Utilities companies have a continued responsibility for electricity, gas and water supply, sewerage and telecommunications services and connections. Planning should also consider the wider environmental effects of increased demand, in terms of both the additional need for basic resources and of the associated emissions to air, soil or water." The Core Strategy will include a section on infrastructure and implementation and will have a policy that deals specifically with these issues.

Electricity Supply

The National Grid has reported no current issues with provision and that the electricity service provider EDF is responsible for securing supply. EDF Energy is aware of a significant number of potential developments throughout the City of Brighton and Hove all of which represent a substantial increase in the demand for electricity.

(Infrastructure Capacity Study 2005-2026)

Gas Supply

There are no current issues with gas supply.

Waste

The City Council (City-clean) is responsible for recycling services; refuse collection and street/ beach integrated cleansing operations in Brighton and Hove. The City Council has signed up to a waste management contract in partnership with East Sussex County Council. The contract has to deliver key facilities in order to be able to continue to deliver services in the future. Existing facilities to store and bulk materials for recycling do not have sufficient capacity to enable services to continue to develop. For these reasons a Materials Recovery Facility (MRF) is required. A Waste Transfer Station (WTS) is also required as local landfill void is projected to run out by 2008.

(Infrastructure Capacity Study 2005-2026)

Water Quality / Water Supply / Water Disposal

Southern Water provides water to Brighton and Hove. Improvements to supplies for new developments are funded at least in part by the developer. The assumption is that per capita water consumption will stabilise over the next few years and demand will not grow in line with households. They also have a number of schemes in their current 5-year plan for improvements in the area.

Southern Water as the statutory water and sewerage undertaker has an obligation to serve new developments. The planning authority will be informed of any lapse in capacity for any particular development so that improvements can be made prior to occupation of the premises.

Drinking water for Brighton and Hove is supplied mainly from groundwater sources in the form of underground chalk aquifers. Seawater quality is of equal importance in terms of environmental quality and its value as a key recreational asset. Similarly other surface water resources, such as ponds, provide a range of uses and habitats.

Damage to such water resources can occur from physical disturbance and pollution. The protection of these resources from development likely to cause such problems is particularly important and relies heavily on the planning system. It is important to ensure that new development does not worsen the situation. It is essential that the risk of flooding be taken into account when considering development proposals because of the potential impact on people and property.

The Environment Agency raised issues about development in the Brighton and Hove area; Southern Water replied that they have a 20-year strategy for water supply and distribute the abstraction evenly across the area where possible. They are aware that the Brighton Chalk aquifer is near its licensed limits and have carried out work in order that this will not be exceeded by the proposed future developments. Therefore, Southern Water does not foresee a problem with water supply in the long term. New development also requires sewers and wastewater treatment. Southern Water has put in a proposal for a new wastewater treatment works (WTW) and trunk sewer.

Energy Efficiency

To successfully reduce green house gas emissions from the city, it is necessary to understand how much is produced and where they are produced. This will allow us to focus on the major sources of greenhouse gases and monitor the effectiveness of actions taken to reduce them.

The latest figures show that Brighton & Hove emitted a total of 1,373 kilotonnes of carbon dioxide in 2003 – that is equivalent to about 5.5 tonnes per resident. To put this in context, the average home in the UK produces 6 tonnes of Carbon Dioxide a year.

Air Quality

Improving air quality is a key requirement of sustainable development. Pollution from transport, urban development and industry degrades clean air. The Environment Act 1995, Part IV places a statutory obligation on all local authorities to review and assess the air quality within their area.

Brighton & Hove City Council designated an Air Quality Management Area (AQMA) in line with the relevant Government guidance. The declared Air Quality Management Area (AQMA) with respect to the predicted exceedance of the NO₂ annual Air Quality Objective (AQO), this area includes the Lewes Rd and London Rd. New monitoring results from long-term surveys show that air quality in Brighton and Hove has generally improved since 2003.

Landscape and Coastline

The main geological interest on Brighton & Hove's coastline is the chalk cliff line to the east of Black Rock. The cliffs are designated a Site of Special Scientific Interest (SSSI), a

Regionally Important Geological Site (RIGS) and a Geological Conservation Review site (GCR). Castle Hill Site is designed as a site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC).

Black Rock Beach is designated as a Site of Nature Conservation Importance (SNCI), which is colonised by sea cabbages and other vegetated shingle species. This is identified as a BAP habitat. Vegetated shingle is a nationally rare habitat type and is listed on Annex I of the EC habitats directive as a habitat of international conservation importance.

Transport

Traffic congestion occurs on the road network in Brighton & Hove and can be caused by a number, or combination, of different factors such as sheer traffic volumes, physical constraints or pinch points in the network, badly parked vehicles, roadwork's and accidents. It can be detrimental in a number of different ways which include delays to emergency service vehicles, bus services and goods deliveries, poor air quality, increased severance of communities, and 'rat running' traffic using less suitable (often residential) roads to reach their destinations. Congestion can also lead to frustration and stress for motorists, who may seek to use alternative, but less suitable, routes to reach their destinations.

Walking is a popular choice and therefore a high priority in the city with numbers increasing in recent years to the extent that the proportion of residents walking to work is well above regional and national averages.

In 2005 Brighton & Hove was one of six towns and cities in the UK to be awarded Cycling Demonstration Town (CDT) status. This award provides some £500,000 p.a. grant funding for cycling projects over three years (2005-8). The CDT funding will substantially enhance cycling provision between 2005 and 2008.

Bus Use

The city has a comprehensive network of bus services, most of which are provided commercially at no direct cost to the Council by the Brighton & Hove Bus Company. Partnership working by the bus company and the Council has seen substantial investment in a number of improvements:

- New fully accessible low-emission vehicles, all of which are equipped with CCTV
- Accessible bus stops
- Automatic vehicle tracking by satellite and associated real time passenger information displays at many bus stops
- Extensive bus priority measures including bus lanes and traffic signal priorities
- Improved bus service frequencies, and
- Innovative marketing, including a flat fare system and high quality branding

The Core Strategy

This is the document that will provide the overall spatial vision for the future of the city. It will address the important citywide matters such as housing, the economy, shopping, transport, tourism, community safety, urban design and regeneration. At the heart of the Core Strategy, running

through all its themes, will be the principles of sustainable development. The Government expects that the Core Strategy will:

- Generally match up with the strategic policies in the South East Plan - the council's vision and objectives must reflect this Plan;
- Take forward the planning related aims and commitments of the Community Strategy, which sets out the wider vision for Brighton and Hove up to 2020;
- Take into account and integrate with other city-wide plans and strategies, including the Local Transport Plan; and
- Translate the Government's national planning policy into the local context, particularly Planning Policy Statement 1: Delivering Sustainable Development.

What are the Core Strategy Spatial Objectives?

The emerging Core Strategy sets out a series of objectives against which planning policies; land allocation and general development control policies will be established.

The Core Strategy objectives and the Sustainability Appraisal Objectives were originally appraised against each other in the Core Strategy Scoping Report. Following consultation on the Core Strategy objectives and the Core Strategy Scoping Report, several of the objectives have been revised; therefore the revised objectives have been appraised against each other in the SA Report.

The following spatial objectives when compared against the sustainability objectives raised the potential for negative input in the absence of mitigation. Any new growth requires further resource and land use, and therefore this may have a negative impact on biodiversity, air quality, water use, water pollution, climate change and waste generation. Mitigation has been identified in more detail in the full SA Report - section 8 'Appraisal of Core Strategy Growth Options and recommendations.'

The LDF objectives are shown below:

SO1 Contribute to addressing the causes of climate change and ensure that new development in Brighton and Hove is prepared for the predicted local impacts of climate change.

SO2 Contribute to a reduction in the ecological footprint of Brighton and Hove by ensuring that all new development in the city is of sustainable design and construction, which; minimises water consumption and demolition and construction waste, maximises energy efficiency; and reuses rainwater and grey water,

SO3 Ensure that all new development in the city provides for the demands that it generates and is supported by the appropriate physical and social infrastructure in time to serve it.

SO4 Recognise the physical constraints of the sea and the South Downs to the city's development and so maximise the use of previously developed land, and make full and efficient use of such land, including higher density residential development in appropriate locations.

SO5 Work with partners to develop safe and sustainable means of access to and across the city; including ensuring that new development is located so as to minimise the need to travel and is either easily accessible by sustainable transport or that sustainable transport measures can be put in place to serve the development.

SO6 Ensure that all new development, and any addition or alteration to the public realm, exhibits a high standard of urban design and architectural quality that: respects the particular locally distinctive urban or suburban townscape of the city; that positively accommodates the needs of all members of the community; and that protects all strategically or historically important views of and within Brighton and Hove and takes opportunities to enhance such views through good urban design where appropriate.

SO7 Recognise that Brighton and Hove's historic built environment is an important asset of regional and national significance and seek to enhance the built heritage of the city through positive measures, including by encouraging new roles for significant historic buildings whose restoration and reuse has the potential to provide wider regeneration benefits.

SO8 Apply the principles and approaches of healthy urban planning to Brighton and Hove and contribute to, and learn from, membership of the World Health Organisation's 'Healthy Cities Network'.

SO9 Ensure that Brighton and Hove is a city where all people feel safe in public places and within their neighbourhoods through working with partners to create a safer

environment, reduce crime and reduce the fear of crime.

SO10 Recognise the acute and distinct housing needs of the city and work with partners to provide for a sufficient mix of housing, in terms of type and tenure, that is affordable, accessible, designed to a high standard, and adaptable to future change.

SO11 Develop Brighton and Hove as a major centre on the Sussex Coast, to act as a regional hub and as a catalyst for the wider Sussex Coast sub-region.

SO12 Improve the economic performance of the city and plan to raise the Gross Value Added by 3.2% per year to 2016 and increase the employment rate in the priority neighbourhood renewal areas.

SO13 Support high growth and key employment industry sectors: creative industries, financial services, engineering and construction, ICT, tourism, health, retail, leisure and hospitality by working with partners to ensure that there are appropriate premises and a well-trained and suitably skilled local workforce.

SO14 Safeguard the city's existing stock of industrial and business sites and premises; encourage their reinvestment and identify suitable sites to accommodate an additional 20,000m² of office floor space to meet future demands in the period 2016-2026.

SO15 Work to narrow the gap between the identified deprived neighbourhoods and the rest of the city through improvements to healthcare, education, housing and the environment, community safety and

employment prospects; and by supporting community engagement in regeneration.

SO16 Maintain and strengthen the regional role of Brighton City Centre by recognising and protecting the unique retail mix and leisure function of the City Centre and the particular contribution that independent retailers make to its character.

SO17 Work with partners to enhance the distinct character and physical environment of the town and district centres (Hove centre, London Road, Lewes Road, St James's Street and Boundary Road/Station Road) and direct new retail and associated development to these centres where a need for expansion has been demonstrated. Support a widened role for the local shopping centres to enable them to contribute towards a greater sense of community in the areas they serve.

SO18 Support the role of Brighton and Hove as a regional priority area for tourism and enable its visitor attractions and services to provide for a sustainable year round growth in visitors.

SO19 Enhance the seafront as a year round place for tourism, leisure, recreation and culture and ensure that key seafront sites are developed to support these uses.

SO20 Protect, conserve and enhance the Areas of Outstanding Natural Beauty / proposed South Downs National Park, including their wider countryside setting, and support the establishment of the city as a 'gateway' to the Downs.

SO21 Support the establishment of a Green Infrastructure Network in Brighton and Hove to preserve and enhance the city's priority areas for biodiversity and require that new development contribute to the Green Infrastructure Network where appropriate; in all cases ensure that nature conservation opportunities are maximised in existing open spaces and in new development.

SO22 Protect or enhance the quality and quantity of parks and green spaces in the city, formal and informal, building on their individual character and landscape to ensure that they are valued by the whole community and well used throughout the year.

SO23 Work with partners to promote the provision of, and equality of access to, a network of primary and specialist healthcare facilities; opportunities for sport and recreation; and opportunities for lifelong learning.

Revised Sustainability Appraisal Objectives:

1. To achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.
2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning.
3. To maintain local distinctiveness and preserve, enhance, restore and manage the City's historic landscapes,

- townscapes, parks, buildings and archaeological sites effectively.
4. To meet the essential need for decent housing, particularly affordable housing.
 5. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promotes compact, mixed-use, car-free and higher-density development.
 6. Minimise the risk of pollution to water resources in all development.
 7. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
 8. To promote the sustainable development of land affected by contamination.
 9. To protect the coast.
 10. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment
 11. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, and tourism, retail, leisure and hospitality sectors.
 12. To improve the overall level of health for all communities in Brighton & Hove.
 13. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
 14. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.
 15. To engage local communities into the planning process.
 16. To make the best use of previously developed land.
 17. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development.
 18. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
 19. To maximise the use of renewable energy technologies in both new development and existing buildings.
 20. To encourage new developments to meet EcoHomes/BREEAM 'Excellent' standard.
 21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and to local, healthy, affordable food stores.
 22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these.

The 'Issues and Options'

The 'Issues and Options' document published in October 2005 set out five possible broad approaches to accommodating the predicted growth of the city over the next 20 years. It was anticipated and explained that the preferred option would be likely to consist of a combination of two or more of these broad approaches (or any credible alternative approach put forward during community involvement). The potential strengths and weaknesses of each approach were set out in the document. Following consultation only four approaches, A, B, C & D were considered the most viable and these have been appraised by the sustainability appraisal objectives.

A - an accessibility-led approach

This would involve optimising development within the built-up area by identifying areas of growth opportunity for higher density development based primarily upon their accessibility to sustainable travel. Such an approach would cover both housing and employment uses. It would be likely to mean development concentrated around sustainable transport corridors (such as Eastern Road/Edward Street) and nodes (such as Hove Station) and around the city centre, town centres (Hove and London Road) and district centres (St James's Street, Lewes Road, Brighton Marina and Boundary Road/Station Road). This approach could also take into account how close sites are to public open space.

B - a regeneration-led approach

This would involve optimising development opportunities within the

built up area by identifying areas of growth opportunity based upon regeneration needs, directing new development towards the East Brighton "eb4U" area and the other Neighbourhood Renewal Fund areas.

C - an urban character /urban capacity-led approach

This would be based on the findings of three studies, which are either underway or have recently been produced. The Urban Characterisation Study will identify, describe and map the distinct urban, suburban and rural neighbourhoods of the city and subdivide these into character areas based on an analysis of the topography, street patterns, building forms, land uses, density and open space in each area. The Urban Capacity Study review will establish how much additional housing could be accommodated in the urban areas of the city by a thorough identification of potential sites. The Tall Buildings Study defines broad areas of the city that are suitable for tall buildings (6 storeys or more in height) and identifies nine such potential areas.

D - limited development and expansion on the urban fringe

This would still mean optimising development opportunities within the existing built-up area but, in addition, allows for limited encroachment into the countryside if this can be justified in the long term (beyond the next 10-15 years). This would include areas of poor quality 'urban fringe' on the outer edges of the city and open areas of land, which are not included within the National Park and are therefore no longer subject to any formal designation.

E – identification of large strategic development sites

In addition to optimising development opportunities within the built up area, this long term approach would include planning for significant extension at the Marina, significant land reclamation at Shoreham Harbour or even a man-made 'island' off the coast, principally to provide at least 1,000 new homes in each case.

Summary & Mitigation of the Growth Options for Brighton and Hove

The growth options have been appraised against the 22 sustainability objectives and the full appraisal tables are available in Appendix B in the SA Report. The summary of the appraisal and recommendations can be found in section 8 of the SA Report.

There are negatives and positives for each growth option however any growth will add pressure on existing resources and therefore the following mitigation is suggested.

Government guidance seeks mutual gain for economic, social and environmental factors and emphasises the need to be sustainable. The Local Development Framework fundamentally seeks to provide guidance on where and how future development should be carried out. In the past environmental issues have been rather peripheral to many development proposals. It is imperative that environmental issues are fully integrated into the Core Strategy. In an era when many leading experts recognise that ecological resources are becoming increasingly overburdened, global warming and climate change are occurring.

Therefore planning must fully address these issues to ensure a sustainable future.

Environmental factors are also fundamental in good quality design, the sustainability of materials, efficient use of resources (water, energy etc), urban design and the balance between the built and natural form. It is increasingly essential to ensure future development is in harmony with its surroundings given that densities are likely to rise. If the environment becomes degraded the area becomes less attractive economically and the quality of life of the residents and workers are affected which can lead to an increase in social and economic problems.

It is suggested that no growth options appraised should be used in isolation but instead combined to increase sustainability across the city and the following mitigation is recommended.

The results of the Urban Capacity Study, Open Space Survey and the Urban Characterisation Study should be combined with any growth option chosen. The carrying capacity of the areas specified for growth may already be stretched resulting in further negative impacts; these studies should be used to provide information for future growth. It is recommended that Health Impact Assessment (HIA) should be included in any large development proposals to identify existing problem areas and therefore the effects of further development.

It may be necessary to allow limited growth on the urban fringe to relieve the carry capacity of the city; this growth must include high standard sustainable transport measures along with the mitigation measures outlined

in this report should be included. It is suggested that any growth on the urban fringe is limited.

Accessibility for pedestrians and sustainable transport are recognised as essential tools for improving the city, along with access to essential services and to locally grown food. Deprived areas must be included in all growth options, employment should be created in these areas and health and safety improved before the development of new housing takes place, these areas may not be stable to accommodate a higher density until social conditions have been improved.

New developments offer the best opportunity to integrate sustainability into their design, without which the ecological footprint for Brighton and Hove will grow and sustainability will not be achieved.

The Ecological Footprint of the South East is the highest of any region in the UK, at an estimated 6.09 gha/per (global hectares per person), well above the national average. It is estimated the Ecological Footprint is growing at approx 1.11% per year, which could bring an increase of 25% over the South East plan period (2006 – 2026).

The sustainable use of water resources in Brighton and Hove is essential. The effects of climate change include longer periods without rain; Sussex has just experienced one of the driest winters in almost 100 years, and the worst drought since 1976. With changes in life style and increased use of domestic appliances we use around 160 litres per person every day. That's 50% more water than we used 25 years ago. This water consumption has to be reduced and

new developments should incorporate water efficiency measures.

Any growth option needs to minimise the risk of pollution to water resources, therefore the use of Sustainable Urban Drainage Systems (SUDS) should be incorporated into the core strategy. If water resources are not protected from pollution, ground water will become contaminated and this may have an adverse effect on drinking water availability and wildlife. Also climate change needs to be considered, the changing climate is likely to bring more extreme weather conditions, with intense rainfall expected, the use of SUDS can assist with flooding and pollution prevention. Material, used for development should be recycled, and come from a sustainable source with a low embodied energy.

Biodiversity should be integrated into all new developments; increasing biodiversity on brownfield sites will lead in a net gain in biodiversity. Biodiversity features such as green roofs/roof gardens, green walls, tree planting; nesting boxes should be provided as they can help to link existing green spaces or create new habitats.

The sections of the coast line near the Brighton Marina is a Special Site of Scientific Interest (SSSI) and has suffered from retreating cliffs in the past. Therefore new developments at the Marina need to consider any adverse affect they may have on the coast.

It is recommended that all developments meet EcoHomes / BREEAM excellent standard. All new development across the city must take into account the changing climate and be adaptable and robust to extreme

weather events. Brighton and Hove City Council has produced a Draft Climate Change Action Plan and the recommendations within this report should be incorporated into new developments.

The development of more housing, employment and tourism will produce more waste; therefore it is essential that material efficiency be encouraged. New businesses should be encouraged to include material efficiency measures. New housing development must provide recycling storage provisions. Construction and demolition waste must be reused or recycled.

Sustainable Development is a fundamental goal of the Government, the South East England Regional Assembly (SEERA) and the City Council and is essential for our quality of life. Because of existing policy and legislative objectives, it is possible to achieve growth with social and economic gains by combining environmental improvements. We are increasingly aware of the impact on the environment and have the ability to build good quality developments, which sustain and enhance it.

Specific Issues and Options

The aim of the Brighton and Hove 'Community Strategy 2020' is to develop a 'city of opportunities' founded on building a sense of community, social justice, rights, responsibilities and sustainable development. Eight priority areas have been identified:

1. Promoting enterprising and learning;
2. Reducing crime and improving safety;
3. Improving health and well being;

4. Strengthening communities and involving people;
5. Improving housing and affordability;
6. Promoting resource efficiency and enhancing the environment;
7. Promoting sustainable transport;
8. Promoting quality services.

The Core Strategy has additional headings of that are not topics in the Community Strategy. These are:

- Shoreham Harbour.
- Rural/Urban Fringe.
- Seafront.
- Infrastructure and implementation.

The topic headings have several policy options, which have each individually been appraised against the 22 Sustainability Appraisal objectives including any alternatives and the business as usual option.

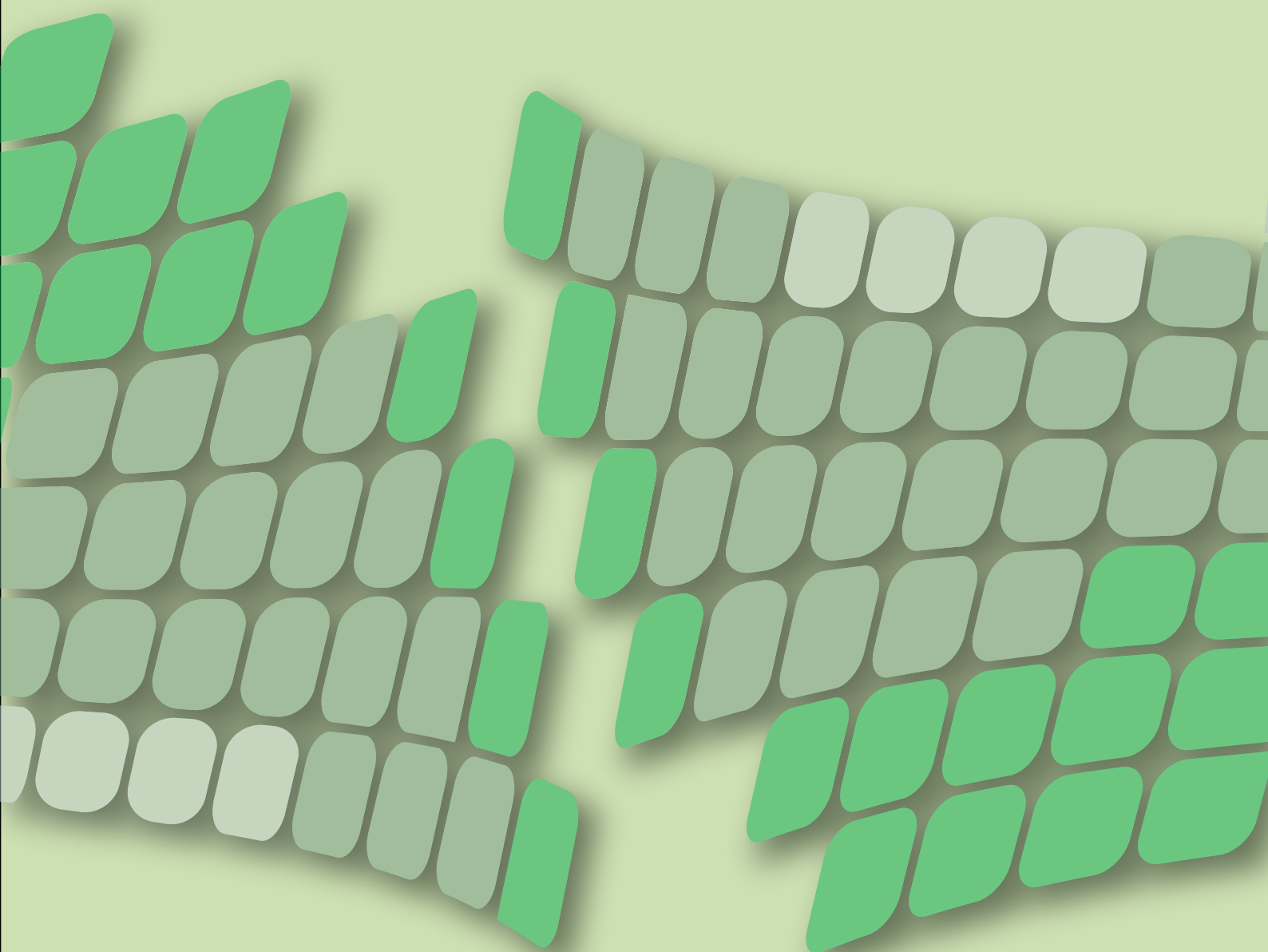
The appraisal process identified any positive and negative impacts that may arise from specific policy options and sustainability issues that should be considered. Through this process it was then possible to recommend any amendments to the policies and also identify mitigation.

The full assessment tables and explanatory text can be found in the full interim Sustainability Appraisal Report which is located on the Brighton and Hove City Councils website

<http://www.brighton-hove.gov.uk>

Next Steps:

The summary and full sustainability appraisal report, along with the preferred options will be sent to the Statutory Environmental Bodies for consultation November 2006.



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