

Appendix 3 – Summary of City Plan Part Two Background Studies

Urban Fringe Further Assessment 2015 – Ecology and Landscape

The purpose of the study was to provide more detailed landscape and ecological assessment of some of urban fringe sites identified as having potential for residential development in the 2014 Urban Fringe Assessment (UFA 2014).

Sites or clusters of sites assessed were those which had been identified as having potential for significant landscape impact in the 2014 Urban Fringe Assessment, and those which either contained or were adjacent to a nature conservation designation. 34 sites were identified as requiring a more detailed landscape assessment and 28 were identified as requiring more detailed ecological assessment. The method for the landscape assessment was based on a Landscape and Visual Impact Assessment. The ecological assessment incorporated a Phase 1 Habitat Survey. Both assessments were informed by site visits.

The assessments were used to determine whether the indicative areas with housing potential identified in the 2014 UFA were broadly correct; whether the indicative housing density/yield was considered to be appropriate; and whether the mitigation identified would be sufficient and feasible, whether additional mitigation would be required, or whether mitigation would not overcome adverse impacts.

The study found that the areas identified with housing potential and the recommended housing densities identified in the 2014 UFA were broadly correct for most sites. The study made more detailed landscape and ecological recommendations for mitigation for all sites. The study recommended changing the area of development potential/ densities for 10 sites/site clusters. This included reducing the area across 6 sites/site clusters, increasing the area across 3 sites/site clusters, and recommended that no development should take place on one assessed site¹.

Urban Fringe Further Assessment 2015 – Archaeology

The purpose of the study was to provide more detailed archaeological assessment of some of the sites identified as having potential for residential development in the 2014 Urban Fringe Assessment.

Sites or clusters of sites assessed were those where the 2014 UFA had identified potential for archaeological sensitivities. 18 sites were identified as requiring further assessment. The method for the assessment was based on a standard archaeological desk-based assessment and included a site walkover.

The aims of the assessment were to identify the main historic constraints for each site/site cluster, outline likely impacts from development, identify relevant mitigation and determine whether the areas with potential for residential development were broadly correct.

The study found it unlikely that any of the sites would contain archaeological deposits of natural significance that would constitute an insurmountable constraint to development. The study found that all sites had archaeological potential and that the impact would vary from site to site, with mitigation being informed by comprehensive archaeological works at the time of any planning application/development. The study recommended that there should not be expansion of the areas

¹ Hollingbury Park.

with development potential in 6 of the sites/site clusters assessed, due to potential impacts on settings of designated heritage assets as well as buried archaeological deposits.

Brighton & Hove City Council and the South Downs National Park Authority Gypsy & Traveller Site Assessments 2017

A joint site search exercise undertaken by the City Council and the SDNPA to establish to what extent the need for new traveller pitches² could be met through site allocations. The process followed these steps:

1. Inclusion of sites/land, identified from shortlisted sites from previous site search work, locations of unauthorised encampments, and sites assessed in the Urban Fringe Assessment that were considered to have potential for housing development;
2. A high level sieving exercise was then undertaken to remove sites with no potential by considering the sites against a number of absolute constraints;
3. A more detailed examination of the 27 sites that remained, including a detailed independent landscape assessment of greenfield sites that had not already been excluded for other reasons.

The outcome of this process was a shortlist of one site within Brighton & Hove '*Land to north-east of Coldean Lane*' that was considered to have potential for development as a traveller site through allocation in the Brighton & Hove City Plan Part 2, subject to more detailed on-site examination and assessment. No sites were identified within the South Downs National Park.

Brighton & Hove Detailed Traveller Site Assessment 2017

An independent Study was commissioned by the City Council to scrutinise the site selection process undertaken up to that point and to further assess the shortlisted site ('*Land to north-east of Coldean Lane*') in more detail.

The site was visited by the consultant team and site information was recorded using a proforma previously agreed with the Council.

During the assessment process, it was confirmed that the site was no longer available as it is being progressed as a Joint Venture with a Registered Provider for 100% affordable housing and therefore unavailable for alternative uses.

² As identified in the 2014 Gypsy and Traveller Accommodation Assessment, BHCC and SDNPA.

Housing and Employment Land Study 2017

The purpose of the study was to provide a comprehensive review of housing and employment site assessments which support the site assessment process for the draft City Plan Part Two. The study reviewed the approach and work undertaken to date on the council's housing land availability assessment (SHLAA) and updated the 2013 Employment Land Trajectory.

The study confirmed that robust and credible assessments of land availability have been undertaken to inform the housing and employment trajectories for the City Plan Part Two and the study also provided the council with recommendations which will be taken into consideration in preparing future updates of the SHLAA.

As part of the work undertaken the study reviewed a sample of potential housing sites to test assumptions around achievability and delivery potential and this has informed the 2017 SHLAA update and housing site allocations. The study also assessed the potential development sites put forward through the CPP2 Scoping Consultation 'Call for Sites' and a schedule of secondary employment sites and made recommendations on future development opportunities and whether the secondary employment sites should be safeguarded. These assessments have informed the 2017 SHLAA update as well as housing site and mixed use allocations in the draft City Plan Part Two.

SHLAA 2017 Update

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

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

The 2017 SHLAA Update indicates there is an overall citywide potential for around 15,046 units of housing to 2032; with a further 1,082 identified beyond this 15 year period. The 2017 SHLAA update estimates delivery to be approximately 13,600 by 2030 which would achieve the City Plan Part One target of 13,200 by the end of the plan period. The 2017 SHLAA update has been used to update the city's five year housing land supply position and demonstrates that a five year supply for the city for the period can be demonstrated for the period 2017-2022 using the Phased Requirement Method endorsed by the City Plan Part One Inspector.

Lyon Close, Hove Report of Design Workshop (2017)

An officer workshop was held 22 November 2017 facilitated by Design South East who then prepared the report. The purpose of the workshop was to establish design principles for the development of the wider site bounded by Davigdor Road, Holland Road, Montefiore Road and the railway line in Hove. The site includes a number of office, trade retail, professional and residential buildings under construction or approved with adjacent healthcare uses.

The report suggests that a vision for the wider site should build on the areas role as a local centre with a diverse mix of housing, community, local retail and leisure, health and employment uses at a medium to high density. It proposed improved permeability through the block and links towards the nearby St Anne's Well Gardens. The image of the whole area should be improved with traffic calming and additional planting on Davigdor Road itself, with improvement in the public realm, additional street trees and good north south road crossings. The report also sets out a number of design principles (such as improving vehicle access and connections, promoting active building frontages and providing amenity space for new residents and workers) informed by the workshop discussion, site visit and analysis which could benefit from further discussion with landowners and testing.

The workshop informed the site allocation policy for Lyon Close, Hove in the draft City Plan Part Two and the report sets out site masterplan and design principles which can help inform discussions with landowners and developers.

Brighton & Hove Wildlife Study Review 2017

The study provided a review of the earlier Brighton and Hove Wildlife Site 2013 review process to endorse its findings and to ensure that the recommended suite of local wildlife sites (LWS) is robust and fit for inclusion in the City Plan Part Two. The Review was carried out in accordance with DEFRA guidance and undertaken by the East Sussex Local Nature Partnership Technical Panel in 2017. The 2017 panel reviewed the 2013 survey sheets and maps, and from the information available, assessed whether the sites met the Brighton & Hove LWS selection criteria and the Sussex criteria.

Where there was a change in recommendation between the reviews, this was predominantly based on a change in site conditions resulting from development, or on additional information becoming available in the interim period. Where recommendations made in 2013 for the designation of new sites could not be endorsed due to the lack of survey data, these sites have been retained as candidate LWS. 14 potential sites were declined as LWS by the 2013 Panel. This view was endorsed by the 2017 review as they did not meet the selection criteria (it should be noted that 5 of these sites are already protected as Local Nature Reserves).

Twenty six existing sites of Nature Conservation Importance were assessed as being worthy of retention and should be renamed as Local Wildlife Sites (LWS) and included in the City Plan part Two policies map. Twenty-four new sites have also been endorsed for designation and inclusion in the CPP2. Seven sites have been identified as having potential to be designated as LWS, pending an assessment of up-to-date survey information; these sites will be listed as candidate LWS within the City Plan Part Two.

As part of the consultation on the City Plan Part Two the owners and occupiers of the above sites should be notified of designations and provided with copies of site citations.

Brighton & Hove CPP2 Energy Study 2018

The purpose of the study was to provide technical support to consider the scope/ opportunities for further energy and sustainability policies in the City Plan Part Two. The study builds on work presented within the 2013 Energy Study. The study reviewed the current regulatory context and noted recent government strategies such as the Clean Growth Strategy which highlight the need to decarbonise heating supply in conjunction with decreasing heating energy demand through improved energy efficiency. The study involved an analysis of the current fuel consumption and CO₂ emissions and potential projected changes in gas and electricity consumption; assessed the current energy efficiency of the building stock and the current levels of installed or planned low and zero carbon (LZC) energy generation capacity within Brighton & Hove.

The report identified a variety of potential opportunities for the council to consider in order to strengthen and support the adopted City Plan Part One Policy CP8 Sustainable Buildings either through new policy in the CPP2 or through technical guidance.

The study recommended extending the minimum carbon dioxide reduction target to apply to all development not just new residential dwellings. The study considered this would help mitigate carbon emissions associated with all new development within the city and meet local and national policy objectives with respect to the reduction of carbon dioxide emissions.

The study analysis showed that there are opportunities across the city for delivering decentralised, low and zero carbon energy technologies within new development. Although there are some locations where the use of specific technologies may require further consideration and have implications for the design of buildings, solar technologies and air source heat pumps for example are expected to be suitable in most of the Development Areas (identified in the CPP1).

The study analysis showed there are opportunities to further increase the generation of energy from decentralised, low and zero carbon technologies in specific areas of the city where either greater opportunity exists or where there is a need for the mitigation of environmental impacts. These opportunity areas suggested include the Development Areas (identified in CPP1); housing site allocations in the urban fringe and existing safeguarded industrial estates. The study recommended requiring all new development to submit an Energy Statement to better ensure that all new development complies with the requirements of City Plan policies.

The study also indicated that district heat networks will play a role in the transition to lower carbon heating and recommended that CPP2 provide further detail to support the delivery of necessary infrastructure to enable future connection to district heat networks.

The study also recommended that CPP2 should recognise the opportunities for community-led energy projects and encourage developers to work with community groups to deliver energy projects as part of new developments.

Given the importance of addressing energy consumption from domestic and non-domestic buildings, the study considered opportunities to improve the performance of existing and new developments should be taken. Based on analysis of current EPC rating and potential ratings the consultants recommend introducing minimum standards on EPC ratings for existing and new buildings that come through the planning system above the Minimum Energy Efficiency Standard (MEES) regulations which came into effect on 1st April 2018.

Brighton & Hove Visitor Accommodation Update Study 2018

The Brighton & Hove Visitor Accommodation Study Update 2018 provides an updated assessment of future demand for visitor accommodation (hotels, guest houses, aparthotels, short-term holiday lets and home sharing) in Brighton & Hove. The study included meetings and telephone interviews with hotel managers in the city and telephone survey of guest house and B&B owners.

The study found that Brighton & Hove's visitor accommodation supply has grown and changed significantly since 2006 with a 11% increase in hotel provision; an increase of hostel provision and the closure of 25 guest houses/ hotels to non-visitor accommodation uses. There has been substantial increase in the supply of short-term holiday lets with as many as 1,500 – 2,000 properties being actively marketed for such use. The city is under-represented in terms of international hotel brands and new contemporary hotel products and brands but has a much larger independent hotel and guest hotel sector than compared with other major cities in the South East and competitor UK conference cities.

Analysis of performance data found that the city has one of the strongest hotel markets in the UK and significantly improved hotel performance since 2006. The city hotels are full and turning away business for much of the time at weekends during peak holiday season and during peak conference months. Guest houses are trading in a more competitive and challenging environment however there remains strong demand for this type of accommodation. Throughout April to October the majority of guest houses that took part in the survey reported an average annual occupancy of over 60%. There is a strong market for short-term holiday lets in the city. Many are operating as businesses, available year round, charging high prices particularly at weekends and achieving high occupancy rates.

All indicators point to continuing growth in demand for all forms of visitor accommodation in the city particularly from the leisure tourist markets and could grow by 2-45 per annum over the next 5 years. Hotel demand projections prepared for the study indicate a potential requirement for up to 5 further hotels to 2030 above those already in the development pipeline. Given the lack of available sites in the city centre the study recommends identifying opportunity areas for hotels to be included in the City Plan Part 2.

The study assessed whether regulation of the short term holiday let properties is required in order to control impact on housing supply; to ensure compliance with fire regulations and other health and safety regulations; to avoid noise and disturbance and in order to control the impact on other types of visitor accommodation. However whilst other European cities have introduced licensing systems to regulate short term holiday lets there is no current government legislation that would allow the council to introduce such systems .

The findings and recommendations have informed the preparation of City Plan Part Two in terms of guidance on hotel site allocation and visitor accommodation development management policies. The updated study will also be used to guide the assessment of planning applications for new hotels and assist the City Council in considering the need and options for regulating short-term holiday lets and home sharing.