

LDF Core Strategy; Summary of Background Studies

Affordable Housing Development Viability

The study built on a previous Viability Study in 2004. Developer type appraisals were carried out across a range of notional sites, 10 and 15 units (flatted developments) in sample areas of low, medium and high house prices in the City. Development viability was tested for 40%, 45% and 50% affordable housing to be provided on site. A methodology was also suggested for calculating financial contributions in lieu of on-site affordable housing on sites of 9 units or fewer and appraisals carried out to test the viability of such proposals.

The Study found that for on-site affordable housing, 40% affordable housing remains financially viable. However, the aim should be to secure greater developer subsidy than previously. Secondly, that a financial contribution from sites providing 2 to 9 residential units would be financially viable. All policy positions to be kept under review in light of delivery and wider planning obligations.

Appropriate Assessment (of potential impact on European Wildlife sites)

The administrative area of Brighton & Hove includes the Castle Hill Special Area of Conservation, and a number of other European or Ramsar wildlife sites are located in the wider area. The proposals in the revised preferred options version of the Core Strategy have been assessed under the provisions of the Habitat Regulations as to whether they will have a significant adverse effect on any European or Ramsar wildlife sites.

The Appropriate Assessment scoping report concludes that the Core Strategy does not contain any proposal that would have an adverse effect on the integrity of any European or Ramsar site.

Creative Industries Workspace

The purpose of the Study is to quantify the amount of creative industries workspace that the city will need from 2007-2017 if it is to adequately house and support this sector. It notes the many different types of workspace that creative businesses currently occupy and that many of these do not fit into the traditional B use classes. It researches the number of creative industries businesses in the city and the size of space typically required per employee. It also estimates that the sector is likely to continue growing at a rate of between 2.5 - 5% per annum (if supported).

The Study also provides 23 local and national case studies illustrating a variety of models of creative workspace initiatives and recommends, amongst other things, the encouragement of mixed-use developments to meet the projected need for workspace; suggests that live-work initiatives and various

forms of new investment vehicles are explored. It makes twenty recommendations designed to contribute to the development of affordable creative industry workspaces in the City.

The key findings are:

Creative industries businesses account for 10.7% of total employment in the city (15,800 people in 2007). The sector, if supported, is projected to grow at between 2.5 and 5% a year. 65,000 square foot of additional creative industries workspace is needed annually to accommodate growth at 2.5%.

- There is a demonstrable lack of affordable, appropriate and available workspace to support the growing creative industries sector.
- Creative industries chose to work in close proximity to one another and currently cluster primarily within the city's BN1 post-code area.
- Creative businesses are experiencing a shortage of workspace and premises and the availability of commercial accommodation most affordable by creative industries is in a size of property least suitable and appropriate for occupation by creative enterprises.
- All sub-sectors would benefit from the temporary use of empty spaces and premises for specific projects, especially where employment intensifies for short periods.
- Almost one-third of all creative businesses in the city currently occupy residential accommodation (usually their own) and the development of live/work schemes, particularly in the social rented sector, offer significant potential to secure additional workspace.

Recommendations:

- A strategy for planning for creative industries needs to flow through the local development framework from a strategic approach in the Core Strategy to more detailed policies in subsequent planning documents and in implementation mechanisms.
- The needs, profile and benefits of the arts and creative industries should be reflected in the Core Strategy.
- The LDF should consider a broader view of economic development to ensure that creative industry workspace needs are fully recognised.
- Some creative industries make use of community halls/ churches and other spaces which are not traditionally viewed as traditional employment spaces. An approach to safeguarding these uses should be continued in the Local Development Framework.
- The LDF should recognise that mixed use developments provide an opportunity to provide new creative workspace and this consideration should be taken in developing development briefs, site allocations and supplementary planning guidance.
- The opportunity to review major development sites to investigate potential to provide an element of creative industry workspace should also be undertaken.
- Existing creative industry workspace should be protected/ replaced in any redevelopment/ regeneration schemes.

- There is also the need to avoid displacement of the clustering of current creative industries in certain areas of the city, through rising rent and property prices.

Green Network Study – Interim

The purpose of the Study is to identify a green infrastructure network, to identify the locations for delivering areas of new habitat under Biodiversity Action Plan targets and to improve access for people to natural green space. The network also links open spaces to establish continuous routes of green through the city and into surrounding countryside. The green infrastructure network has been defined by a partnership of the City Council, Sussex Wildlife Trust and Geospec (a GIS consultancy based at the University of Brighton). The method used reflected the three key aims of the network:

- Access to natural green space method: Using as a baseline a detailed habitat audit of the City, Natural England’s Accessible Natural Greenspace standards (ANGSt) were used to define a ‘buffer’ around each area of known natural green space.
- Biodiversity method:: An alternative method of defining hinterlands around natural green space was devised using ‘generic species’. These were combined with other data to show the parts of the landscape outside the natural green spaces which are most accessible to the generic species.
- A ‘final potential network’ was defined as being all land identified by either method 1 or 2 or both. Expert opinion and local knowledge was then used to identify the most appropriate linkage areas between the ‘baseline’ spaces. This final stage achieved a continuous green network through the city and defined four types of space within the network: i) core areas, ii) potential core areas, iii) biodiversity enhancement areas linking core areas and potential core areas; and, iv) buffer areas where the primary land use is not biodiversity related.

The findings of the study including a map setting out the proposed Green Network to be linked to preferred option CP5 in the Core Strategy. It is anticipated that funding to implement the network will be generated by a combination of off-site developer contributions and external funding. The interim findings of the Study will be subject to consultation which will inform the final version of the Study.

Open Space, Sport and Recreation - Interim

The Open Space, Sport and Recreation Study is designed to deliver the Council’s statutory requirements – establishing a baseline appreciation of levels of provision in Brighton & Hove and setting standards for quality, quantity and accessibility. The Study aims to provide a clear vision, identify priorities for future open space, recreation and sport provision, and consequently provide direction for the allocation of future Council and developer resources.

The purpose of the Study is to provide a comprehensive assessment of the open space, sports and recreational facilities within the city and recommend open space standards and future strategic options. The Study:

- identifies the current and future needs of the city;
- reviews and analyses the open space and indoor facilities audits;
- recommends local provision standards for all types of open space in terms of quantity, quality and accessibility;
- identifies an appropriate approach to calculating the methodology for developer contributions;
- identifies over and under-supplied areas ;
- proposes strategic options for addressing identified shortfalls in provision, protection and enhancement of existing provision, to relocate or make better use of existing provision and seek new provision.

Strategic Flood Risk Assessment

The role of a SFRA is to provide the evidence to ensure that flood risk is taken into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest flood risk. The first part of the document has been prepared as a Level 1 SFRA, to cover all items as listed in the PPS25 Practice Guide. That is:

- Plans showing Brighton and Hove, location of main rivers, ordinary watercourses and Flood Zones together with allocated development sites.
- An assessment of the implication of climate change for flood risk at identified development areas.
- Area at risk of flooding from other sources.
- Location of any flood risk management measures, including flood warning systems.
- Guidance on the preparation of Flood Risk Assessments (FRAs) for allocated development sites and the applicability of the use of sustainability drainage systems (SUDS).

Consideration of the results of this assessment allows the application of a Sequential Test which together with a more detailed investigation of flood hazard of those sites at risk constitutes the Level 2 SFRA. The principal purpose of the Level 2 SFRA is to facilitate application of the exception test (see below). The Level 2 SFRA considers the flood hazard in more detail, taking into account the presence of flood risk management measures such as defences.

Sequential Test and Exception Test

The Strategic Flood Risk Assessment (SFRA) (see above) provides the basis for applying the Sequential Test. The aim of the Sequential Test is to steer

new development to areas at the lowest probability of flooding. Where areas of lower flood risk are unavailable the Exception Test is applied if the proposal includes certain categories of development. Part of the Exception Test requires development to provide wider sustainability benefits to the community that outweigh the flood risk.

It has not been found possible, consistent with wider sustainability objectives for the city, for all identified Development Areas to be located in areas of low probability of flooding. As a result, the Tests need to be applied to two of the proposed Development Areas: Brighton Marina & Black Rock and Shoreham Harbour & South Portslade. A Sequential Test and Exception Test for the principle of development at Brighton Marina is provided. A Sequential Test for Shoreham Harbour is also included which concludes that the more vulnerable land uses, such as residential development, should be directed to the parts of the Development Area that lie in areas of low flood risk.

Strategic Housing Land Availability Assessment - Interim

The broad aims for this study, set out in Planning Policy Statement 3 - Housing are to:-

- Assess the likely level of housing that could be provided if unimplemented planning permissions were brought into development.
- Assess land availability by identifying buildings or areas of land (including previously developed land and Greenfield) that have development potential for housing, including within mixed use developments.
- Assess the potential level of housing that can be provided on identified land.
- Where appropriate, evaluate past trends in windfall land coming forward for development and estimate the likely future implementation rate.
- Identify constraints that might make a particular site unavailable and /or unviable for development.
- Identify sustainability issues and physical constraints that might make a site unsuitable for development.
- Identify what action could be taken to overcome constraints on particular sites.

The Interim Report shows that the specific identified supply falls slightly short of PPS3 - Housing requirements but adding a contribution from small windfall site development (which is highly significant in B&H) more than makes up the shortfall. The interim results will be tested through consultation with key stakeholders over the summer.

Strategic Housing Market Assessment

The main aims of this study are:

- To provide evidence to inform policies aimed at delivering the right mix of housing across the whole housing market area – both market and affordable housing.

- To provide evidence on the need for different sizes of affordable homes (evidence on the level of affordable housing required is already available from the Housing Needs Assessment produced in 2005).
- To support a strategic approach to housing through consideration of the housing need and demand in all housing sectors – owner occupied, private rented and affordable – by assessing the key drivers and relationships within the housing market

The report provides evidence of the demographic and economic drivers of the housing markets within Brighton and Hove, evidence on the stock and supply of housing within the housing market and the implications for affordability.

The report also considers some specific local issues, including questions around the nature of recent development, the buy-to-let market and concerns about “buy to leave” empty, barriers to trading up in the housing market and issues around the current housing stock including the extent of second homes and houses in multiple occupation.

A key finding is that around 60% of household moves within Brighton and Hove each year are internal (Brighton and Hove residents moving within Brighton and Hove). However, Brighton and Hove’s influence extends into adjacent districts, with significant net out-migration to Lewes and Adur. Brighton and Hove receives around 4,000 people who move each year (2001-2007) from London.

Transport Assessment - Interim

It is essential that the impacts of increased development on the road network can be satisfactorily predicted and understood by the local and national highway authorities. The Transport Assessment [TA] work has been done using the city council’s computer-based transport model. It has tested the predicted transport effects in the morning and evening peak hours for traffic in two future years – 2016 and 2026 - by considering conditions:-

1. without the proposed LDF strategy
2. with the proposed LDF strategy

and then assessed the effects of examples of strategic transport measures that would be expected to minimise the effects of increased movement and activity by providing increased choice in transport alternatives when making journeys.

Without the planned growth proposed in the LDF, the key findings are that :-

- development will still occur within the city through implementation of existing planning permissions, and potential windfall developments.
- without significant measures to encourage and provide alternatives to reduce the demand for travel by car, overall levels of traffic and associated congestion will continue to increase, thereby increasing problems of road safety, air quality and noise. For example, by 2026 the amount of car travel within the city is predicted to increase by nearly 15%, and congestion levels will be some 12% higher than they are today.

With the proposed LDF spatial strategy:-

- the proposed increase in employment is expected to lead to a reduction in the level of outward commuting, and as the majority of these new employment places would be located within/adjacent to the city centre, they will be highly accessible by public transport;
- the increases in traffic levels and congestion in 2026 are minimal (2-3%) compared to the 'without LDF' approach

This is because the proposed Development Areas are sustainably located primarily within the core urban area and adjacent to major public transport corridors, and a substantial proportion of proposed developments within the Development Areas are allocated for employment purposes rather than residential development.

In order to demonstrate how the traffic impacts of the LDF strategy can be minimised, the Transport Assessment has also tested the incremental effects of 3 examples of strategic long-term transport solutions, as identified in preferred option CP8 of the current LDF Core Strategy.

These are:-

- 1) the enhancement and intensification of current policies (including RTS, extension of parking controls, a proportion of car free development and promotion of walking, cycling and other wider travel planning initiatives);
- 2) as above in 1), plus the introduction of a Park and Ride strategy (based on 5 new park and ride sites introduced on the main approaches to the city); and
- 3) as above in 2) plus the introduction of fiscal charging measure that would only be applied as part of a national scheme.

The conclusions drawn from this initial work are that overall levels of traffic flow and congestion with the LDF planned growth approach are similar to or lower, and therefore an improvement over, an 'unplanned' approach.

