

**Brighton & Hove City Plan Part One
Schedule of Proposed Modifications Arising from the Inspector’s Initial Conclusions**

The modifications below are expressed in the conventional form of ~~strike through~~ for deletions and underlining for additions of text.

Modifications are in City Plan order. The policy number and City Plan page number are shown in the second column.

Reference numbers in the first column relate to the Full Schedule of Proposed Modifications set out in Appendix 3, placed in the Members’ Rooms.

Ref	Policy/ Paragraph	Proposed Modification
PM010	Section 2 – The Strategy, Spatial Strategy Pages 24,28,29	<p>A Spatial Strategy for Brighton & Hove</p> <p>2.7 <u>Recognising the need to plan positively to meet the needs of a growing city</u>, the City Plan's aim is to seek to achieve a balanced and sustainable approach to accommodating growth over the plan period.</p> <p>Strategy for the future of Brighton & Hove</p> <p>2.12 The assessed housing requirements (demand and need for new homes) for the city over the plan period are much higher than the city can realistically accommodate. The plan sets a minimum housing target of 11,300 <u>13,200</u> new homes to be achieved by 2030 and this reflects the capacity and availability of land/sites in the city; the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.</p> <p>The Spatial Distribution of Development</p> <p>2.19 Spatially the majority of new housing, employment and retail development <u>will be located on brownfield (previously developed) sites within the city's built up area and will be directed to eight specific development areas (DA1 – 8)</u>. 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. This approach ensures that <u>opportunities for development of brownfield sites are maximised</u>, transport impacts will be minimised and the city's countryside and the South Downs National Park will continue to be protected.</p>

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		<p><u>2.20 Much of the land within the city’s defined urban fringe forms part of the city’s green infrastructure; either in terms of the city’s open space framework (e.g. parks, recreation grounds, sports pitches and playing fields, allotments, cemeteries, natural/semi-natural space) or part of the city’s biodiversity resource such as local nature reserves, sites of conservation importance or Nature Improvement Areas. However in light of the significant scale of the city’s housing need, objectively assessed to fall within a range of 18,000 - 24,000 new homes to 2030[#]; the requirement of the government’s National Planning Policy Framework to plan positively to meet housing needs in full and; the need to adequately address the social dimension of sustainable development the potential for housing from the urban fringe has had to be reassessed^{##}. The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites but also includes the urban fringe as broad source of potential for housing development.</u></p> <p>Insert footnotes: [#] Coastal West Sussex Housing Study Update 2014 ^{##} Urban Fringe Assessment Study June 2014</p>
<p>PM018, PM019, PM021</p>	<p>DA2 Brighton Marina, Black Rock and Gas Work Site, pages 38 – 40, 44</p>	<p>Amend Illustrative diagram to remove from key and map ‘shopping area’. Amend policies map to reflect this.</p> <p>3.13 The long term aspiration of the council is to address the deficiencies of the Marina, including the underperforming District Shopping Centre, and the wider area to facilitate the creation of a mixed use district <u>area</u> of the city. This will be achieved through the generation of a sustainable high quality marina environment which creates easier and more attractive access for residents and visitors, extends the promenade environment up to and around the Marina and creates stronger pedestrian and visual links with the sea from the Marina.</p> <p>Amend policy:</p>

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		<p>The strategy for the development area is to facilitate the creation of Brighton Marina and the wider area as a sustainable mixed use district <u>area</u> of the city, through the generation of a high quality marina environment by supporting proposals which:</p> <ul style="list-style-type: none"> • Secure a high quality of building design <u>that takes account of the cliff height issues in and around the Marina</u>, townscape and public realm while recognising the potential for higher density mixed development in accordance with the aims of the Spatial Strategy to optimise development on brownfield sites; • Do not breach the cliff height within the Marina; <p>...</p> <ul style="list-style-type: none"> • Secure a more balanced mix of retail, including support for independent retailers, <u>and non retail uses such as leisure, tourism, and commercial uses</u> and non-retail uses, <u>which accords with its District Centre status;</u> <p>...</p> <p>6. Balancing uses with an emphasis towards boating, surfing, leisure and recreation and the enhancement of the District Centre <u>retail offer</u> through encouraging the provision of mixed retail activity and services to support any additional expansion in population (see CP4).</p> <p>...</p> <p>Proposals for uses in addition to the recreation and leisure use will only be considered where it can be demonstrated that these uses support the delivery of a leisure and recreation facility and are not in competition with the District Centre status of <u>complement development at the Marina</u>. Supporting or enabling uses should perpetuate informal leisure uses associated with the seafront, conserve the historic environment and enhance linkages between Black Rock, the Marina and the Gas Works site.</p> <p>...</p> <p>3.17 The Marina is identified as a District Centre in the city's retail hierarchy (see Policy CP4). The</p>

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		<p>majority of <u>existing</u> retail activity takes place in the Merchant's Quay and at the Asda superstore. Whilst the District Centre <u>Brighton Marina</u> contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role, it <u>currently</u> lacks the full range of shops and services, such as banks and post offices, found typically in District Shopping Centres <u>to support the proposed expansion in residential population</u>. The strategy for the development area is to enhance the choice and performance of retail activity in the District Centre <u>Marina</u> through the encouragement of mixed retail activity and improvements to the public realm. Ancillary <u>Retail development on the Black Rock and Gas Works sites should accord with CP4 Retail Provision. not compete with or prejudice the District Centre at the Marina. A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.</u></p> <p>Add New Paragraph in supporting text after 3.15:</p> <p><u>Fundamental to the strategy for the development area is the provision of mixed use development at a density that helps achieve a vibrant and sustainable place. However proposed developments should ensure the preservation and/or enhancement of the setting of all listed buildings and conservation areas nearby, as well as the wider historic landscape and city skyline including views to and from the South Downs National Park. Applications for higher density development will be assessed in terms of their ability to meet the design and density considerations set out in CP12 and CP14. It is essential that any new development provides an attractive pedestrian environment, active retail and leisure frontages as well as easy access to the harbour, boardwalk, shoreline and other recreational areas within the Marina.</u></p>
PMO64	SA4 Urban Fringe, pages 111- 113	3.154 In many instances the South Downs National Park boundary is contiguous with the built up urban edge of the city. The urban fringe is therefore now made up of 'pockets' of residual green space rather than any homogenous green 'belt' around the city. These areas are vulnerable to development pressures, farm fragmentation and anti-social behaviour such as fly-tipping, vandalism and inappropriate recreational activity such as illegal motor biking. Elsewhere there has been

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		<p>piecemeal enclosure both for the keeping of horses and garden use. <u>Much of the city's urban fringe meets the NPPF definition of existing open space and represents a significant proportion of the city's open space resource. The urban fringe is also important in terms of biodiversity and designations include the South Downs Way Ahead Nature Improvement Area, Local Nature Reserves (LNRs) and Sites of Nature Conservation Interest.[#]</u></p> <p>3.155 Within the urban fringe, there will be some opportunities for development to help meet citywide needs. The appropriate nature and form of any such development will need to reflect the need Careful use and management of land within the urban fringe is therefore essential in terms of helping to retain the setting of the city in its downland landscape.</p> <p>SA4 Urban Fringe</p> <p><u>The</u> <u>Where appropriate, the</u> council will promote and support the careful use and management of land within the urban fringe to achieve the following objectives:</p> <ol style="list-style-type: none"> 1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city. 2. Securing better management of the urban fringe, environmental improvements and safe public access to the countryside through sustainable means. 3. The promotion of the urban fringe <u>land</u> as part of the city's green network and, <u>where appropriate,</u> encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP10 Biodiversity).

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		<p>4. The protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface water runoff and soil erosion.</p> <p>5. The creation of ‘gateway’ facilities and interpretative facilities in connection with the South Downs National Park to support sustainable tourism.</p> <p>Development within the urban fringe will not be permitted except where:</p> <p>a) a site has been allocated for development in a development plan document; or b) a countryside location can be justified;</p> <p><u>and where it can be clearly demonstrated that:</u></p> <p>c) the proposal has <u>had</u> regard to the downland landscape setting of the city; d) all <u>any</u> adverse impacts of development are minimised and appropriately <u>mitigated and/or</u> compensated for; and e) where appropriate, the proposal helps to achieve the policy objectives set out above.</p> <p><u>Should proposals for development come forward prior to the adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material planning consideration in the determination of applications for residential development within the urban fringe.</u></p> <p>Insert the following new Paragraph between 3.157 and 3.158 :</p> <p><u>Some land within the city’s urban fringe has been identified as having potential to help meet the city’s housing requirements (see Part B, Policy CP1 Housing Delivery). Sites identified through the 2014 Urban Fringe Assessment Study (or parts of sites where relevant) will be considered to have</u></p>

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		<p><u>potential for housing in the Strategic Housing Land Availability Assessment exercise. Further consideration and a more detailed assessment of potential housing sites will be undertaken to inform allocations made in Part 2 of the City Plan with a particular emphasis on delivering housing to meet local needs. As part of this process, the City Council will consider how best to ensure that opportunities for community land trusts, community-led development, right to build, and housing co-operatives are brought forward/ safeguarded in order to maximise housing opportunities that meet local housing needs. This will be taken forward through the City Plan Part 2. Sites coming forward for development ahead of the preparation of Part 2 of the City Plan will need to address criteria c) to e) set out in Policy SA4 above and satisfy detailed information requirements[#] at the planning application stage.</u></p> <p>Add new footnote:</p> <p><u># This may include, for example, landscape assessment, ecology and archaeology surveys, traffic assessments and possibly Environmental Impact Assessment.</u></p>
PM072	CP1 Housing Delivery, pages 127-132	<p>Amend first sentence in Part A of policy:</p> <p>The council will make provision for at least 11,300 <u>13,200</u> new homes to be built over the plan period 2010 – 2030 (this equates to an annual average rate of provision of 565 <u>660</u> dwellings).</p> <p>Amend Part B of Policy:</p> <p>B: Distribution of new housing.</p> <p>New housing will be delivered broadly in line with the following distribution:</p>

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		Area / Source of Supply	No. of new homes
		Development Area	
		DA1 – Brighton Centre and Churchill Square Area	20
		DA2 – Brighton Marina, Gas Works and Black Rock Area	1940
		DA3 – Lewes Road Area	840
			875
		DA4 – New England Quarter and London Road Area	1485
			1130
		DA5 – Eastern Road and Edward Street Area	470
			515
		DA6 – Hove Station Area	630
			525
		DA7 – Toad's Hole Valley	700
		DA8 – Shoreham Harbour	400
			300
		Development Area Total	6155
			6005
		Development Across Rest of City:	3945
		a) <u>Within the built up area</u>	<u>4130</u>
		b) <u>Within the urban fringe[#]</u>	<u>1060</u>
		Small identified sites	650
			765
		Small Windfall Development	600¹²⁵
			1250¹²⁵

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		<table border="1" data-bbox="555 316 1503 427"> <tr> <td data-bbox="555 316 1144 352"></td> <td data-bbox="1144 316 1503 352"></td> </tr> <tr> <td data-bbox="555 352 1144 389">Total</td> <td data-bbox="1144 352 1503 389">11,350</td> </tr> <tr> <td data-bbox="555 389 1144 427"></td> <td data-bbox="1144 389 1503 427"><u>13,210</u></td> </tr> </table> <p data-bbox="555 469 1111 536">Insert footnote: # As defined in policy SA4 the City Plan Part 1.</p> <p data-bbox="555 577 851 608">Amend footnote 125:</p> <p data-bbox="555 646 1957 740">¹²⁵An allowance for small windfall development has been made for the final 6 years of the plan period 2024 – 2030; although it is anticipated that small windfall development will contribute to meeting the housing target in earlier parts of the plan period. An allowance for small windfall development has been made across the plan period. See 2014 SHLAA.</p> <p data-bbox="555 783 1962 1034">4.2 Based on demographic factors, (reflecting scenarios of population and household growth), the city’s full (unconstrained) housing requirement, for both market and affordable housing, over the plan period has been assessed at 15,800 new homes to 2030. This would equate to an annual average of 790 new homes per annum) A series of studies indicate that to meet in full the city’s ‘objectively assessed housing need’ (housing demand and need) over the plan period to 2030 could mean needing to build between 900 – 1200 dwellings per annum or 18,000 – 24,000 dwellings to 2030¹²⁷.</p> <p data-bbox="555 1077 851 1107">Amend footnote 127:</p> <p data-bbox="555 1145 1868 1209">¹²⁷Brighton & Hove City Council, Housing Requirements Study Update, GL Hearn, October 2012 Assessment of Housing Development Needs Study: Sussex Coast HMA, May 2014.</p> <p data-bbox="555 1286 1957 1391">4.4 The City Plan housing target for a minimum of 41,300 <u>13,200</u> new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to make provision in the city for other</p>			Total	11,350		<u>13,210</u>
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		<p>essential development (for employment, retail, health and education facilities, other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.</p> <p>4.6 The spatial strategy for the city is set out earlier in this Plan (see Spatial Strategy, Section 2). In broad terms, the strategy seeks to direct a significant amount of new development to eight identified Development Areas (see Policies DA1-8) 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 and renewal will secure substantial benefits for the city. <u>The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites within the built up area but it also acknowledges that some housing development will come forward from some of the city’s urban fringe sites. This is reflected in Part B of Policy CP1.</u></p> <p>4.7 The eight Development Areas account for just over half (54%) 45% of the planned amount of new housing for the city. Within the Development Areas, the City Plan makes strategic allocations to secure the delivery of 3235 new dwellings (see spatial policies DA2 – DA8). In other parts of the city, there are also a significant range of opportunities for new residential development (through, for example conversions, redevelopment and changes of use) and such development will help to promote and secure the establishment of sustainable communities. Residential development will be required to respect the local character and distinctiveness of neighbourhoods (see also SA6, CP12 and CP14).</p> <p>4.8 Over the last 15 years¹²⁸ the average rate of new housing development in Brighton & Hove has been around 550 540 dwellings per annum. More recently, annual rates of housing delivery have been far lower than this reflecting the ongoing impacts of global economic recession¹²⁹.</p> <p>Amend footnote 128:</p> <p>¹²⁸ 1997/8 – 2011/12, Residential completions data. <u>1999/00 – 2013/14 Residential Completions Data.</u></p>

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		<p>4.10 The city’s housing target implies an annual average rate of 565 <u>660</u> dwellings per annum over the plan period as a whole. Based on the 2012 <u>2014</u> SHLAA update, the <u>housing trajectory</u>¹³⁰ <u>demonstrates that housing delivery in the city has been below this in the first four years of the plan period (2010-2014), reflecting the impacts of economic recession. The trajectory anticipates that housing delivery is likely to achieve at least this rate in the first ten years after plan adoption (2014–2024) will increase in the (post adoption) five year supply period 2014 – 2019 and achieve the planned average delivery rate of 660 units per annum. In the following six to ten year supply period (2019 – 2024), housing delivery rates are anticipated to increase significantly with delivery coming through from a number of the city’s larger strategic development sites. For the post 2024 period, the trajectory indicates that housing delivery is again likely to exceed the planned average delivery rate. The council’s Housing Implementation Strategy (HIS) identifies a range of <u>positive planning management actions and measures to ensure that housing delivery is achieved assist in across the plan period in accordance with guidance in the NPPF for maintaining a five year supply of deliverable housing. bringing forward sites for development should this prove necessary.</u> The HIS also identifies that further site allocations will be made through the preparation of Part 2 of the City Plan.</u></p> <p>Amend footnote 130:</p> <p>¹³⁰As informed by the 2012 SHLAA Update <u>the 2014 Revised Trajectory.</u></p> <p>Replace Figure 2 with revised Housing Trajectory:</p> <p>Figure 2: Housing Trajectory 2010 – 2030 (Based on 2012 SHLAA)</p>

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		<p style="text-align: center;">Brighton & Hove Housing Trajectory as at 1st April 2012</p> <table border="1"> <caption>Estimated Data for Figure 2: Housing Trajectory 2010 – 2030</caption> <thead> <tr> <th>Year</th> <th>Total Actual Supply</th> <th>Total Identified Supply</th> <th>Small Unidentified Supply (Small windfall)</th> <th>City Plan Target (pa)</th> </tr> </thead> <tbody> <tr><td>2010/11</td><td>280</td><td>0</td><td>0</td><td>565</td></tr> <tr><td>2011/12</td><td>310</td><td>0</td><td>0</td><td>565</td></tr> <tr><td>2012/13</td><td>0</td><td>450</td><td>0</td><td>565</td></tr> <tr><td>2013/14</td><td>0</td><td>450</td><td>0</td><td>565</td></tr> <tr><td>2014/15</td><td>0</td><td>650</td><td>0</td><td>565</td></tr> <tr><td>2015/16</td><td>0</td><td>650</td><td>0</td><td>565</td></tr> <tr><td>2016/17</td><td>0</td><td>650</td><td>0</td><td>565</td></tr> <tr><td>2017/18</td><td>0</td><td>650</td><td>0</td><td>565</td></tr> <tr><td>2018/19</td><td>0</td><td>650</td><td>0</td><td>565</td></tr> <tr><td>2019/20</td><td>0</td><td>680</td><td>0</td><td>565</td></tr> <tr><td>2020/21</td><td>0</td><td>680</td><td>0</td><td>565</td></tr> <tr><td>2021/22</td><td>0</td><td>680</td><td>0</td><td>565</td></tr> <tr><td>2022/23</td><td>0</td><td>680</td><td>0</td><td>565</td></tr> <tr><td>2023/24</td><td>0</td><td>680</td><td>0</td><td>565</td></tr> <tr><td>2024/25</td><td>0</td><td>450</td><td>130</td><td>565</td></tr> <tr><td>2025/26</td><td>0</td><td>450</td><td>130</td><td>565</td></tr> <tr><td>2026/27</td><td>0</td><td>450</td><td>130</td><td>565</td></tr> <tr><td>2027/28</td><td>0</td><td>450</td><td>130</td><td>565</td></tr> <tr><td>2028/29</td><td>0</td><td>450</td><td>130</td><td>565</td></tr> <tr><td>2029/30</td><td>0</td><td>450</td><td>130</td><td>565</td></tr> </tbody> </table> <p>Figure 2: Housing Trajectory 2010 – 2030 (Based on 2012 SHLAA) 2010 – 2030 (Based on SHLAA 2014 Update)</p>	Year	Total Actual Supply	Total Identified Supply	Small Unidentified Supply (Small windfall)	City Plan Target (pa)	2010/11	280	0	0	565	2011/12	310	0	0	565	2012/13	0	450	0	565	2013/14	0	450	0	565	2014/15	0	650	0	565	2015/16	0	650	0	565	2016/17	0	650	0	565	2017/18	0	650	0	565	2018/19	0	650	0	565	2019/20	0	680	0	565	2020/21	0	680	0	565	2021/22	0	680	0	565	2022/23	0	680	0	565	2023/24	0	680	0	565	2024/25	0	450	130	565	2025/26	0	450	130	565	2026/27	0	450	130	565	2027/28	0	450	130	565	2028/29	0	450	130	565	2029/30	0	450	130	565
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		<p style="text-align: center;">Housing Trajectory Revised Position 2014</p> <p>The chart displays the following data series:</p> <ul style="list-style-type: none"> Completions (Affordable Housing): Represented by yellow-green bars at the bottom of the stack from 2010/11 to 2013/14. Completions (Market Element): Represented by dark green bars stacked above the affordable housing completions from 2010/11 to 2013/14. Affordable Housing Delivery (estimate of 30% per annum from 2014): Represented by light blue bars starting from 2014/15. Identified Supply (Market Element): Represented by dark blue bars stacked above the affordable housing delivery. Small Unidentified Supply (Small windfall allowance): Represented by grey bars at the top of the stack from 2017/18 onwards. City Plan Annual Target (660pa): Represented by a horizontal green line at the 660 units level. <p>Amend footnote 131: ¹³¹SHLAA 2012 2014 Update.</p>

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		<p>4.12 The table <u>below</u> illustrates that approximately 3230 <u>3,740</u> dwellings have either already been built since 2010 or are currently 'committed' for development in terms of <u>either</u> sites having an extant planning permission or <u>an allocation</u> in the 2005 Brighton & Hove Local Plan. This plan makes strategic site allocations to achieve a further 3635 dwellings. Further capacity is identified for an additional 3885 <u>4585</u> dwellings and appropriate site allocations will need to be made in Part 2 of the City Plan. These 'identified' sources comprise <u>990%</u> of the overall housing target to 2030.</p> <p>Table 4: Housing Delivery, Supply Breakdown 2010 – 2030 (Based on 2012 <u>2014</u> SHLAA)</p> <table border="1"> <thead> <tr> <th>Spatial Area</th> <th>Already Built or Committed</th> <th>Strategic Allocations</th> <th>Broad Locations / <u>Source</u></th> <th>Further Capacity Identified in SHLAA</th> <th>Allowan ce For windfall</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>DAs</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>DA1</td> <td>13</td> <td>0</td> <td></td> <td>7</td> <td></td> <td>20</td> </tr> <tr> <td>DA2</td> <td>855</td> <td>1085</td> <td></td> <td>0</td> <td></td> <td>1940</td> </tr> <tr> <td>DA3</td> <td>420 <u>126</u></td> <td>300</td> <td></td> <td>390 <u>449</u></td> <td></td> <td>850 <u>875</u></td> </tr> <tr> <td>DA4</td> <td>285 <u>380</u></td> <td>615</td> <td></td> <td>285 <u>135</u></td> <td></td> <td>1185 <u>1130</u></td> </tr> <tr> <td>DA5</td> <td>0 <u>10</u></td> <td>335</td> <td></td> <td>135 <u>170</u></td> <td></td> <td>470 <u>515</u></td> </tr> <tr> <td>DA6</td> <td>420 <u>90</u></td> <td>200</td> <td></td> <td>340 <u>235</u></td> <td></td> <td>630 <u>525</u></td> </tr> <tr> <td>DA7</td> <td>0</td> <td>700</td> <td></td> <td>0</td> <td></td> <td>700</td> </tr> <tr> <td>DA8</td> <td>0 <u>52</u></td> <td></td> <td>400 <u>248</u></td> <td></td> <td></td> <td>400 <u>300</u></td> </tr> </tbody> </table>	Spatial Area	Already Built or Committed	Strategic Allocations	Broad Locations / <u>Source</u>	Further Capacity Identified in SHLAA	Allowan ce For windfall	Total	DA s							DA1	13	0		7		20	DA2	855	1085		0		1940	DA3	420 <u>126</u>	300		390 <u>449</u>		850 <u>875</u>	DA4	285 <u>380</u>	615		285 <u>135</u>		1185 <u>1130</u>	DA5	0 <u>10</u>	335		135 <u>170</u>		470 <u>515</u>	DA6	420 <u>90</u>	200		340 <u>235</u>		630 <u>525</u>	DA7	0	700		0		700	DA8	0 <u>52</u>		400 <u>248</u>			400 <u>300</u>
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		DA	1390	3235	400	1130		6155
		Total	1525		250	1000		6005
		Rest of City	1190		500	1856		3945
		a) Built up area	1450	400	390	1890		4130
		b) Urban Fringe				1060		1060
		Small id. Sites	650					650
			765					765
		Small Windfall				600		600
						1250		1250
		Total	3230	3635	900	2985	600	11350
			3740		640	3945	1250	13210
		<p>Paragraph 4.13</p> <p>Amend the final sentence to read:</p> <p><u>Part B of Policy CP1 also indicates that some sites within the city’s wider urban fringe will contribute to housing land supply. Sites will be taken forward for further consideration and detailed assessment as site allocations through Part 2 of the City Plan. The 2014 Urban Fringe Assessment Study will be a material consideration in the determination of any applications for residential development on urban fringe sites that come forward prior to the adoption of Part 2 of the City Plan (see Policy SA4 Urban Fringe).</u></p>						

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		<p>4.15 Government <u>National</u> planning <u>policy</u> guidance requires sufficient specific sites and/or broad locations to be identified to meet planned housing targets for at least the first ten years of the plan¹³³. In reality, small ‘windfall’ site development (as described above) will come forward throughout the plan period and will contribute towards meeting the planned housing requirements for the city and ongoing five year supply requirements. <u>The potential supply from small windfall site development is reflected in the planned housing target for the city (see Part B of Policy CP1).</u> In this way, development from small windfall development activity will supplement housing supply achieved from identified sites and also provide a measure of contingency should there be an element of non-delivery from some of the large development sites. Given the NPPF requirements, a minimal allowance for development from this source has only been included as part of the city’s projected land supply after 2024.</p> <p>Amend footnote 132:</p> <p>¹³²Small site development <u>has</u> accounted for approximately <u>35%</u> 36% of total residential development across the city over the last 10 years.</p> <p>4.16 The housing trajectory is based upon reasonable <u>and realistic</u> assumptions about the deliverability of housing over the plan period. The trajectory illustrates that the rate of housing delivery in the city is expected to increase over the first ten years of the plan period (post-adoption) reflecting anticipated recovery in the economy and financial markets which has severely affected development rates in the early years of the plan period. The trajectory will be updated and reviewed on an annual basis to track delivery progress against planned housing requirements and the requirement to maintain a five year supply of housing land/sites. This will be reported through the council’s annual Authority Monitoring Report. The council’s Housing Implementation Strategy outlines how housing delivery will be managed over the plan period.</p>
<p>PM078, PM081</p>	<p>CP4 Retail Provision, Pages 144, 146</p>	<p>Brighton & Hove's hierarchy of shopping centres will be maintained and enhanced by encouraging a range of facilities and uses, consistent with the scale and function of the centre, to meet people's day-to-day needs, whilst preserving the predominance of A1use</p>

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		<p>classes:</p> <table border="1" data-bbox="566 384 1641 1204"> <thead> <tr> <th data-bbox="566 384 831 459">Centre Definition</th> <th data-bbox="831 384 1350 459">Defined Centres</th> <th data-bbox="1350 384 1641 459">Linked Policies</th> </tr> </thead> <tbody> <tr> <td data-bbox="566 459 831 496">Regional Centre</td> <td data-bbox="831 459 1350 496">Brighton</td> <td data-bbox="1350 459 1641 496">DA1, SA2</td> </tr> <tr> <td data-bbox="566 496 831 571" rowspan="2">Town Centres</td> <td data-bbox="831 496 1350 533">Hove</td> <td data-bbox="1350 496 1641 533"></td> </tr> <tr> <td data-bbox="831 533 1350 571">London Road</td> <td data-bbox="1350 533 1641 571">DA4</td> </tr> <tr> <td data-bbox="566 571 831 719" rowspan="4">District Centres</td> <td data-bbox="831 571 1350 608">St James's Street</td> <td data-bbox="1350 571 1641 608"></td> </tr> <tr> <td data-bbox="831 608 1350 644">Lewes Road</td> <td data-bbox="1350 608 1641 644">DA3</td> </tr> <tr> <td data-bbox="831 644 1350 681">Boundary Road/Station Road</td> <td data-bbox="1350 644 1641 681">DAB</td> </tr> <tr> <td data-bbox="831 681 1350 719">Brighton Marina</td> <td data-bbox="1350 681 1641 719">DA2</td> </tr> <tr> <td data-bbox="566 719 831 1204">Local Centres</td> <td data-bbox="831 719 1350 1204"> Mill Lane, Portslade Portland Road, Hove 'The Grenadier' , Hangleton Road Richardson Road, Hove Eldred Avenue ,Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk </td> <td data-bbox="1350 719 1641 1204"> SA6 (all centres) </td> </tr> </tbody> </table> <p data-bbox="551 1241 1933 1385">4.44 The Brighton & Hove Retail Study Update (2011)¹⁶⁰ has reviewed the vitality and viability of each of the shopping centres. The Study does not recommend that any new centres need to be designated but recommends that the District Centre designation for Brighton Marina should be removed. The Council's preferred approach for Brighton Marina is to maintain its designation as a</p>	Centre Definition	Defined Centres	Linked Policies	Regional Centre	Brighton	DA1, SA2	Town Centres	Hove		London Road	DA4	District Centres	St James's Street		Lewes Road	DA3	Boundary Road/Station Road	DAB	Brighton Marina	DA2	Local Centres	Mill Lane, Portslade Portland Road, Hove 'The Grenadier' , Hangleton Road Richardson Road, Hove Eldred Avenue ,Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk	SA6 (all centres)
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		<p>District Centre <u>enhance the choice and performance of retail activity through the encouragement of mixed retail activity and improvements to the public realm</u>, and to continue to address the development and future uses at this location using site specific policy DA2. <u>A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.</u></p>																																				
<p>PM085, PM087, PM089</p>	<p>CP8 Sustainable Buildings, Pages 160, 162,164</p>	<p>Amend table set out under CP8.1:</p> <p>1. All development will be required to achieve the minimum standard as set out below or equivalent standards from a quality assured scheme;</p> <table border="1" data-bbox="607 724 1659 1289"> <thead> <tr> <th rowspan="3"></th> <th colspan="2">Development size</th> <th rowspan="2">Post 2016</th> <th rowspan="2">Post 2019</th> </tr> <tr> <th colspan="2">2013-2016</th> </tr> <tr> <th>Non-major</th> <th>Major and Greenfield</th> <th>All</th> <th>All</th> </tr> </thead> <tbody> <tr> <td>NEW BUILD</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Residential Code for Sustainable Homes</td> <td colspan="2"><u>Level 4</u> Level 5</td> <td colspan="2"><u>Level 5</u> Level 6</td> </tr> <tr> <td>Non-residential BREEAM</td> <td>Very Good</td> <td>Excellent</td> <td colspan="2">Outstanding</td> </tr> <tr> <td>CONVERSIONS</td> <td colspan="4">Non-major (3-9 units) and Major</td> </tr> <tr> <td>Residential</td> <td colspan="4">BREEAM Very good</td> </tr> </tbody> </table> <p>Standards may be updated in other DPD documents and/or a review of this policy.</p>		Development size		Post 2016	Post 2019	2013-2016		Non-major	Major and Greenfield	All	All	NEW BUILD					Residential Code for Sustainable Homes	<u>Level 4</u> Level 5		<u>Level 5</u> Level 6		Non-residential BREEAM	Very Good	Excellent	Outstanding		CONVERSIONS	Non-major (3-9 units) and Major				Residential	BREEAM Very good			
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		<p>4.77 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings¹⁸⁴. Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and carbon neutral development whilst delivering homes and jobs through development is challenging. The combination of standards with provisions for viability assessments will help address this challenge. This will provide the flexibility needed to ensure the right balance between the economic, environmental and social objectives of the City Plan. The standards set out in this policy are commensurate with the scope of this challenge. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city¹⁸⁵.</p> <p>4.83 The Building Research Establishment Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes (CSH) are widely recognised, accredited, independent methods for assessing environmental performance of non-residential and residential buildings, respectively. These tools will be used to support policy decision making because they cover a wide range of sustainability issues within a simplified score that provides flexibility for developers in meeting standards set in this policy. Successors to these tools and/or equivalent standards by nationally recognised certification bodies may also be accepted¹⁹⁰. <u>Any changes to nationally described standards and or revised Building Regulations will be addressed through Part 2 of the City Plan or a review of this Policy.</u></p> <p>4.87 More is asked of larger, new build and greenfield types of development as these tend to benefit from economies of scale and easier, cheaper ways in which sustainable design and construction features can be designed in. A growing number of flagship schemes in the UK¹⁹¹ and in Brighton & Hove¹⁹² have demonstrated the viability of such developments.</p> <p>Delete footnotes 191 and 192:</p>

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Ref	Policy/ Paragraph	Proposed Modification
		<p>⁴⁹¹ See Homes and Communities Agency's Carbon Challenge website.</p> <p>⁴⁹² A number of high standard developments have already been achieved under the 2005 adopted Local Plan policy SU2.</p>
<p>PM099, PM101</p>	<p>CP16 Open Space, pages 196-197</p>	<p>... Planning permission resulting in the loss of open space, including the beach, will not be granted unless:</p> <p>Add at the end of section 1:</p> <p><u>e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p> <p>...</p> <p>4.174 A review of the capacity and need for open space was required and the findings of the Open Space, Sport and Recreation Study 2008 were further assessed through the Open Space Study Update 2011. The Update Study endorsed the local open space standards and the approach taken in the 2008 study. It devised a scoring system to assess open space which was applied to private open spaces and used to inform the 2010 Strategic Housing Land Availability Assessment. However the factors that produce a low open space offer (a combined assessment of 'quantity', 'accessibility' and 'quality' including potential) also limit a site's suitability for housing and no additional open space sites were identified <u>through that study</u> as suitable for housing. <u>However, through the 2014 Urban Fringe Site Assessment Study some of the open spaces within the city's urban fringe has been identified as having some potential to help meet the city's housing requirements (see Policies SA4 and CP1).</u> Unlike other urban open spaces the net loss of some open space in the urban fringe</p>

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Ref	Policy/ Paragraph	Proposed Modification
		<p><u>these sites can more readily be mitigated through the provision of new publicly accessible space, enhancements to existing space or by alternative provision within the National Park and/or compensated for by the National Park's open space offer.</u></p> <p>4.175 When the open space standards are applied, a significant increase in open space will be required by 2030 (an additional 237 <u>293</u> hectares should be created <u>provided</u> when ONS population projections are applied, which however is reduced to 202 hectares when the City Plan housing target of <u>13,200</u> is taken into account <u>the generated demand equates to approximately 167 hectares</u>²¹⁴). It is therefore important new developments seek to provide the open space requirements generated respectively. However due to the city's physical constraints, between the sea and the South Downs National Park, it is recognised that the future open space requirements are unlikely to be met in full. To compensate, more intensive use of existing open space will be needed in an attempt to maintain current quality of life including the opening up of school grounds to the community/public and an expectation that owners should endeavour to enable better open space use of under-used private spaces. There will also be a need to better connect green spaces together to improve accessibility and to improve access for quiet recreation to the South Downs National Park.</p> <p>Amend footnote 214:</p> <p>²¹⁴ONS stands for Office for National Statistics. <u>The 2030 population figure applied is 310,900 based on ONS 2012-based Subnational Population Projections. The indicative generated demand of 13,200 residential units is calculated using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in open space arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. These figures apply a population figure of 302,806 and 294,072 respectively which are based on information in the ONS 2010-based Sub National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) – Initial release of 2011 Census Data. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).</u></p>

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Ref	Policy/ Paragraph	Proposed Modification								
PM102	CP17 Sports Provision, Pages 200-201	<p>... Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:</p> <p>...</p> <p>Add at the end of section 2:</p> <p><u>The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p> <p>...</p> <table border="1" data-bbox="555 794 1686 1390"> <tr> <td colspan="2" data-bbox="555 794 1686 834">Standard for Indoor and Outdoor Sports Facilities</td> </tr> <tr> <td colspan="2" data-bbox="555 834 1686 874">Indoor Sports</td> </tr> <tr> <td colspan="2" data-bbox="555 874 1686 914">Quantity (indoor sport)</td> </tr> <tr> <td data-bbox="555 914 1104 1390">Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.</td> <td data-bbox="1104 914 1686 1390">The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility Plan for further recommendations).</td> </tr> </table>	Standard for Indoor and Outdoor Sports Facilities		Indoor Sports		Quantity (indoor sport)		Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.	The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility Plan for further recommendations).
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		Accessibility (indoor sport)			
		Standards to comply with national best practice.			
		Quality (indoor sport)			
		All facilities should be built or provided in accordance with national best practice			
		Outdoor Sports			
		Quantity (outdoor sport)			
		Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ²¹⁵
		Approx 118.5 Hectares	0.47	0.47	Approx 20 to 23 <u>15.5 to 28</u> hectares
		Accessibility (outdoor sport)			
		20 minute walk time (960 metres)			
		Quality (outdoor sport)			
		Clean, litter-free sports facilities should be provided with appropriate, well drained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.			
		Standard for Indoor and Outdoor Sports Facilities			
		All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.			
		Amend footnote 215: ²¹⁵ Applying a 2030 population figure of 310,900, based on ONS 2012-based Subnational Population Projections, an additional 27.6 hectares of outdoor sport space will be required. However, when the indicative generated demand of the			

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		<p><u>City Plan's housing target of 13,200 residential units is calculated (using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms) an additional 15.5 hectares is required. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in outdoor sport arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. ONS stands for Office for National Statistics. Based on information in the Office for National Statistics 2010-based Sub National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) – initial release of 2011 Census Data. Applying the respective 2030 projection figure of 299,777 an additional 22.9 hectares will be required however on the assumption that the City Plan housing targets will restrict the growth in population to 292,886 this will reduce the additional outdoor sport requirement to 19.66 hectares. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).</u></p>