

10 July 2009

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Brighton & Hove City Council Consultations on:

1. Core Strategy – proposed amendments paper, 2. Sustainability Appraisal DPDs

Background

- i. Last year the council finally introduced a policy (CP5 - Biodiversity, June 2008) which recognized the environment as a key component a '*sustainably led*' LDF. The latest 'Core Strategy – proposed amendments paper' (June 2009) effectively cancels out last year's progress.
- ii. Instead of living in a city where nature and the countryside are a short walk away, the amended Core Strategy has different ideas. Now the council's new vision is for built-up heavily urbanized areas with high-rise towers by the rail station and the marina. Their objective of cramming ever more people into an ever expanding urban area will destroy the fragility of the urban fringe. Their vision will squeeze more concrete out until it reaches the South Downs National Park.
- iii. There will be no more '*urban fringe*' come 2020. There will be no room for locally distinctive areas. The choice becomes concrete and tarmac, or downland. City or National Park. Thrust uncomfortably, unnaturally, cheek by jowl against each other.
- iv. All the amendments are apparently responding to demand. Economic demands, housing demands, employment demands. There is no room left for the environment.
- v. Sustainable development balances environmental improvements with social and economic improvements. These proposed Core Strategy amendments ignore any environmental improvement. Instead they will lead to further environmental disintegration and decay.

Below are some informal initial comments on the main areas in the two documents.

I have used the page numbering from each document with paragraph numbers where given. Please use these comments as you wish and feel free to contact me for further clarification.

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Observations on 'The Core Strategy – proposed amendments paper'

1. Page 4 (Para 2.7): no major policy changes to environmental objectives; instead they are...

Housing	DA2
Social	DA4
Employment	DA7
Housing	SA4
Housing	CP11
Economic	CP16/17

These seem to be economically-driven, not sustainably-driven. Where is the balance?

2. Page 6 (Para 2.1): unclear how 'countryside' is identified. There is a distinctive urban area boundary and a distinctive National Park boundary. How is 'the countryside' indicated? Is this the same as 'the urban fringe' defined on page 7 (footnote 5) as: *Urban fringe is the open space between the built-up area boundary of the city and the boundary of the National Park.*
3. Page 8 (Policy SA4 – Urban Fringe): If the urban fringe prevents urban sprawl why does policy SA4 – 1(a) allocate areas for development? Furthermore, Policy SA4 – 1(c) will permit adverse impacts, where and how will 'compensation' provide the benefit?
4. Page 9 (Para 3.2): The National Park boundary is not contiguous with the built-up area boundary! For example, by the Hollingbury Golf Course and Fort. Such areas surely represent the urban fringe, or the countryside perhaps? These planning definitions need to be clarified.
5. Page 9 (Para 3.4): This concept is totally alien to a sustainable development approach. It is totally inconsistent for housing shortfalls to dictate a 'demand-led' approach. Providing a policy favouring housing beyond the urban boundary will lead to urban sprawl and land purchase by speculative developers with no incentive to manage it effectively for conservation or amenity objectives.
6. This Policy (SA4 – Urban Fringe) creates the illusion of implementing conservation objectives. Yet it provides far more opportunity for housing and economic developments to be identified in the medium term. There is no reason for conflicting environmental improvement objectives and residential development objectives to be trapped within the same policy. OBJECT to the damaging elements of this proposed amendment.
7. Page 18 (Policy DA2(A8) – Brighton Marina, Gas Works and Black Rock Area): SUPPORT protecting and enhancing the ecological and geological diversity. The importance of this area for both biodiversity and geodiversity has been identified in this policy and reflects the unique natural value of this area within the 'sub-region' area.

However, it is also worth noting there is maritime biodiversity which colonized once the marina had been created and is now dependant upon the micro-climate found in the unique marina habitat. This seems to have been ignored in the terrestrial land-based planning decisions, despite the council's jurisdiction extending beyond the harbour walls.

8. Page 22 (Policy DA4 – New England Quarter and London Road Area): Local priorities listed do not include any biodiversity objectives, despite these being part of the Brighton Station Regeneration. Indeed, national planning guidance PPS9 even states;

*"Brighton Station regeneration scheme provides an example of how a local biodiversity site can form the hub of a development, contribute to the quality of life and well-being of future residents and users, and secure and enhance biodiversity..."*

[source: 'Planning for Biodiversity and Geological Conservation  
– A Guide to Good Practice' Paragraphs 4.48 and 4.49  
(March 2006) ODPM, London] ]

9. Page 27 (Policy DA7 – The Shoreham Harbour Area): Priority A6 states '*Reducing the risks from flooding and coastal erosion..., and ensuring that risks are not increased elsewhere.*' Currently the shingle beaches from Portslade, Hove and Brighton are nourished by shingle drifting offshore from west to east. It will be important to ensure this aspect is fully studied before work commences at Shoreham Harbour that interrupts the geomorphological longshore drift of this protective shingle.
10. Page 28 (Policy DA7 – The Shoreham Harbour Area, Priority A12): WELCOME the intention to ensure this is a leading example of sustainable living. However flood risk aspects to beaches eastwards need to be considered as part of the Strategic Flood Risk Assessment mentioned on page 21 (Para 5.9).
11. Page 28 (Policy DA7 – The Shoreham Harbour Area, Priority A8): WELCOME the intention to protect and enhance environmental assets.
12. Page 28 (Policy DA7 – The Shoreham Harbour Area, B. The JAAP will...): CONCERN there is no mention in the list for;
- i. natural environmental enhancements (see Priority A8)
  - ii. flood risk assessment to extend east including Hove and Brighton, with appropriate mitigation measures .
13. Page 33 (Policy CP9(3) – Infrastructure and Developer Contributions): Section 3 refers to 'the council's identified local priorities'. What are these? No priorities for local biodiversity have ever been published by the council.
14. Page 34 (Para 9.3): WELCOME the inclusion of biodiversity as an environmental benefit.
15. Page 41 (table titled, Annex 1: Infrastructure Delivery Plan): 'Nature Conservation', CONCERN that the provision area and phasing timescale are so restricted. This should extend more widely to include natural features covered within the UKBAP, Regional Biodiversity Objectives and Sussex Biodiversity Objectives.

Observations on 'Sustainability Appraisal of The Core Strategy proposed amendments paper'

16. Page viii and ix – Biodiversity: CONCERN that Local Biodiversity Action Plans are identified as being important, yet there is still no Local BAP within Brighton & Hove. Local BAP objectives and targets have not been published. Regional BAP objectives and targets are not even mentioned in this appraisal despite being important in guiding local priorities.
17. Page xv – SO7: CONCERN that '*opportunities...to meet Biodiversity Action Plan objectives.*' is stated without the council's objectives being clearly published. Also CONCERN that these opportunities should not be dependent upon creation of an '*Urban Biosphere Reserve*' which has a longer timescale and is not guaranteed.
18. Page xvi: CONCERN that '*...spatial objectives raised the potential for negative [environmental] impact... There could be a negative impact on biodiversity, and a negative effect on local distinctiveness and the South Downs*'. These are critically important in terms of maintaining the balance of environmental, economic and social objectives that are fundamental to a sustainable plan.
19. Page xxiii (SA4 – Urban Fringe): OBJECT to the negative impacts likely in the long term. The final paragraph is wholly inconsistent with the 2<sup>nd</sup> and 3<sup>rd</sup> bullet points. Once building occurs on undeveloped land the impact cannot be avoided! There is no evidence to suggest that the negative impact can be avoided, or even reduced to environmentally acceptable levels.
20. Page 13 (Table 4.1(1) – Sustainability Indicator): WELCOME the use of BAP features and targets as an indicator. However, what are these targets and values locally?
21. Page 54 (Section 6 – SO7): Biodiversity Action Plan objectives for Brighton & Hove should already exist and be made available. They should not be dependant upon other designations being achieved, as appears to be stated in this paragraph.
22. Page 90 (Appendix A: Relevant Plans,...): Reference should be made to the International Convention on Biological Diversity (CBD) which initiated the UKBAP (referred to p. 96) committing to '***significant reduction in the rate of biodiversity loss by 2010.***'
23. Page 90 (Appendix A: Relevant Plans,...): Reference should also be made to the UN Millennium Development Goals. These critically important development goals should form the heart of development planning. In particular, Goal 7: Ensure Environmental Sustainability has the two targets;

Target 1: Integrate the principles of sustainable development into country policies and programmes and reverse the loss of environmental resources.

Target 2: Reduce biodiversity loss, achieving, by 2010, a significant reduction in the rate of loss.

Refer to their web-site: [www.un.org/millenniumgoals/](http://www.un.org/millenniumgoals/)

24. Page 94 (Point 15): NOTED that the Local Plan (Adopted July 2005) aimed to 'Promote an integrated approach to nature conservation...achieving Biodiversity Action Plan targets'. Where are the examples of significant achievements on these targets?
25. Page 156 (Policy CP16/17 – SA Objectives table): OBJECT to development being indicated as + on existing sites with biodiversity features. This table is not a fair reflection of the damaging impact most likely to be caused in the short and medium terms.
26. Page 159 (Policy SA4 – SA Objectives table):OBJECT, again, building houses on the Urban Fringe can not fairly be reflected a having ++ impacts! This section of the table is misrepresenting the true sustainability impact.
27. Page 185 (Shoreham Harbour Regeneration – 10. Manage coastal defences): OBJECT. The impact on longshore drift of shingle providing flood defence functions to Hove and Brighton is not even covered in this section of the Appraisal.
28. Page 193 (Shoreham Harbour Regeneration – 19. Ensure developments take into account climate change and extreme weather events): OBJECT. It makes a mockery of a sustainability appraisal to state '*Therefore, if development in coastal locations must take place...*'. The solution is to not plan for developments in high risk areas!

- END -

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