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City Plan 2041 Key Issues Consultation, October 2024

Question 1: *Do you agree or disagree that we should continue to focus new development in the eight existing Development Areas? **Somewhat agree***

Question 2: *Are there any other parts of the city that could be suitable for significant new housing or commercial development? Please make suggestions.*

This should be assessed holistically, based on the emerging LNRS to ensure a robust ecological network is protected, maintained and enhanced.

Question 4: *Do you have any comments on our proposed Special Areas?*

Special Areas: 1. The Seafront

Paragraph 2.16 states 'on the coast there are important marine habitats, chalk cliffs, and areas of rare undisturbed vegetated shingles which need to be protected and enhanced.' It is important that these habitats are protected and enhanced, and it would be beneficial to have this translated into policy in the emerging Plan.

Special Areas: 3. Urban Fringe & the setting of the South Downs National Park

Benfield Valley - Sussex Wildlife Trust maintains an objection to this development (BH2024/01720). Local Wildlife Sites have significant nature conservation value and should be safeguarded as per paragraph 192 of the NPPF (December 2024).

Sussex Wildlife Trust disagrees with paragraph 2.28 that states 'detailed assessment exercises across all urban fringe sites for City Plan Parts One and Two indicated that a small number of sites could be sensitively developed to help meet the need for housing in the city'. Overall, there has been significant loss of biodiversity across the City, which is not being acknowledged in this consultation.

This is particularly relevant to Local Wildlife Sites (LWS). There are 51 designated LWS within the boundary of the Brighton & Hove City Plan. Aerial photography shows that eight of these LWS have been totally or partially destroyed by development since the current City Plan was adopted. This is 15% of the LWS resource within the city. Three more LWS are allocated for development, with one site at planning application stage. If these allocations are approved, more than 20% of the city's LWS resource will have been severely impacted by development approved by the council. This is a significant loss in biodiversity that is unacceptable, especially given the council's own declaration of a Climate and Biodiversity Emergency in 2018.

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Draft policies at the next City Plan stage must fully protect locally designated sites and include an incentive to restore and enhance them.

Local Wildlife Sites impacted by development:

- BH02 – Mile Oak Fields (Allocation)
- BH10 – Basin Road South
- BH25 – Brighton Station
- BH28 – Brighton University
- BH31 – Black Rock Beach
- BH43 – Wanderdown Road Open Space
- BH78 – Meadow Vale (allocation)
- BH87 – Land at Coldean Lane (allocation)

Additional Local Wildlife Sites allocated for development

- BH09 – Benfield Valley
- BH22 – Oakdene, Southwick Hill
- BH86 – Bevendean Horse Paddocks

Question 5: *Are there any other means of increasing housing supply that we should consider?*

We strongly question whether the updated housing target is realistic i.e. deliverable, sustainable and desirable. The proposed figure of 2,435 homes per year is nearly four times the current provision of 660 per year. Given the significant constraints already identified and the increasing pressures faced due to the impacts of climate change, BHCC needs to assess the capacity for sustainable development within this severely constrained area and prioritise working within environmental limits to decide what can be delivered based on a robust evidence base, rather than attempt to find increased opportunities to develop new homes based on arbitrary and unrealistic targets. We support a renewed focus on how and where to build houses, not just the overall number of houses being built.

For more detail, please see The Wildlife Trusts' report 'Swift and wild: how to build houses and restore nature together' https://www.wildlifetrusts.org/sites/default/files/2024-10/24SEP_Planning_Report_HR-DIGITAL%20%281%29.pdf

Question 10: *Do you agree we should manage the number of new second homes in the city?* **Strongly agree**

Question 14: *How important is it to you that we require new development to reduce the risk of overheating?* (**Very important**; important; no opinion; slightly important; not important)

Question 15: *Are there any other ways our planning policies could help mitigate climate change impacts?*

Planning policies must be more ambitious to reflect the scale and urgency of the climate and biodiversity crises, and should help deliver Local Nature Recovery Strategies.

We would like to see a greater focus on nature-based solutions, particularly in terms of green infrastructure. Green infrastructure is critical to climate change adaptation yet currently undervalued in the consultation document.

Nature should be integrated into the design of new developments by protecting existing habitats and features, providing wildlife-rich accessible greenspace, and maintaining ecological connectivity to the wider landscape. However, in order to meet net zero targets

there will need to be equal if not greater effort made to retrofit measures into existing homes and buildings to improve energy use and energy efficiency. Measures should include green roofs; rainwater harvesting and sustainable drainage e.g. gutter-fed ponds; installation of bat and bird bricks; and nature-inclusive design of outdoor spaces.

Planning policies should be set within the context of a broader land use strategy to identify areas where development should NOT be permitted (i.e. in areas of flood risk) and to ensure a coherent approach to mitigating and adapting to climate change across all BHCC departments.

Are there any other ways our planning policies can support low and zero carbon energy generation and energy infrastructure?

Since climate change is one of the most serious threats to biodiversity, we support efforts to reduce carbon emissions by producing renewable energy. However, we also recognise that all forms of energy generation will have environmental costs. It's therefore vital that renewable energy projects are planned and delivered to avoid harming wildlife and deliver an overall net gain for biodiversity to support nature's recovery.

Question 17: *How important is it to you that we encourage new development to incorporate Circular Economy principles?* **Very important**

Question 18: *How important is it to you that we encourage buildings to be designed and built with lower embodied carbon?* **Very important**

Question 19: *Would you support us setting specific targets to limit whole life cycle emissions for larger developments?* **Strongly support**

Question 20: *How important is it to you that we set carbon emission reduction standards that go further than the national Future Homes and Building Standard for new development?* **Very important**

Question 21: *Should we set a water efficiency target higher than the current optional national standard?* **Strongly agree**

Question 22: *Should we include non-residential development?* **Strongly agree**

Question 40: *How important to you are the following issues in helping residents lead healthy lifestyles?*

- contact with the natural environment, such as trees and wildlife **Very important**

Question 42: *Would you support any of the following on areas of open space?*

- flood prevention measures, such as rain gardens **Strongly support**
- measures to improve biodiversity, such as butterfly banks **Strongly support**

Question 43: *On larger developments, what types of open space do you think are important to be provided on site?*

- Natural green space, for example, for wildlife **Very important**

Biodiversity and the natural environment

The emerging plan should continue to include stringent nature conservation policies.

Question 46: *Should we be more ambitious with developments that provide mandatory BNG by requiring more than the 10% minimum requirement? What target would you support?*
Yes. We would support a target of 20%

Question 47: Please indicate whether you support providing off-site BNG on a Registered Site that is:

- as close as possible to the development site itself
- away from the site but still within the Brighton & Hove area
- away from the site in a location where wider ecological benefits can be achieved
- across a wider area, for example within the Sussex Living Coast Biosphere area
- Improving the natural environment

Question 48: Do you think we should use a target to increase the amount of green infrastructure provided by larger developments? **Strongly agree**