

**Compiled by the Planning Policy, Projects & Heritage Team
at Brighton & Hove City Council**

Health & Equalities Impact Assessment Addendum

**Proposed Main and Additional Modifications
to the Proposed Submission City Plan Part Two**

February 2022

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Section 1: Background

- 1.1 Brighton & Hove City Council began the preparation of City Plan Part 2 in 2016. In July 2018, the draft City Plan Part 2 was published and was subject to widespread community and stakeholder consultation and the Proposed Submission City Plan Part 2 was published for consultation in September 2020.
- 1.2 As part of the preparation of CPP2, a combined Health & Equalities Impact Assessment (HEQIA)¹ was carried out on the policies contained in the CPP2 to fulfil the council's requirements relating to Health Impact Assessment and Equalities Impact Assessment. The assessment helped to identify potential health outcomes, both adverse and beneficial and their distribution amongst groups with protected characteristics.
- 1.3 The HEQIA was an iterative process and made a number of recommendations on how to improve the policies to ensure beneficial impacts were maximised and to reduce or avoid adverse impacts. These recommendations were incorporated into revised policies at draft stage where relevant.
- 1.4 As a result of stakeholder consultation at draft stage and updated or new evidence, a number of policies were amended between draft City Plan and Proposed Submission City Plan stages. These changes were assessed against the findings of the HEQIA 2018 to determine whether the changes had any potential for impacts on the determinants of health and communities with protected characteristics and therefore change the previous findings of the HEQIA 2018. The results of this assessment were published for consultation alongside the Proposed Submission Stage City Plan Part 2 in the Health & Equalities Impact Assessment Addendum, 2020.²
- 1.5 The CPP2 was submitted for examination in May 2021 and is being examined by Inspector Ms R Barrett, MRTPI IHBC. Examination hearings were held in November 2021. The Inspector advised in her Post Hearing Actions Note (INSP09) that she considered a number of proposed changes/ main modifications to the Plan are necessary to inform her decision on whether the Plan is sound and/or how it could be made sound by Main Modifications (MMs). For consistency with earlier stages, the health and equalities impacts of the proposed modifications have been considered in this HEQIA Addendum. This Addendum will be published as part of the consultation on the Main Modifications alongside other relevant documents, including the Sustainability Appraisal.

¹ <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20HEQIA%20June%202018.pdf>

² <https://www.brighton-hove.gov.uk/sites/default/files/migrated/article/inline/HEQIA%20April%20May%202020.pdf>

Section 2: Purpose of this report and screening exercise

- 2.1 The purpose of this Addendum report is to consider whether there are any health and equalities implications arising from the proposed modifications that have arisen as a result of the Proposed Submission representations, changes to the Use Class Order and modifications arising through the Examination process. This was undertaken by considering all of the changes against the HEQIA appraisal framework as set out in Figure 1, and considering whether the policy amendments would alter the results of the previous HEQIAs findings.

Table 1: HEQIA Appraisal Framework

Health pathway/determinant	Construction Stage	Operation Stage	Impacts on all communities inc. those with protected characteristics
Demography			
Income & Employment			
Education			
Housing			
Transport			
Crime and Safety			
Access and Accessibility			
Services, Amenities & Leisure			
Lifestyle			
Health Needs			
Environment			
Food Access			
Community Cohesion			

- 2.2 When undertaking this exercise, the following were considered potential outcomes:
- No impact on any of the determinants of health or communities with protected characteristics; e.g. amendment is editorial or for clarification purposes.
 - Minor positive or negative effect on one or more of the determinants of health or communities with protected characteristics, however does not change the findings of the HEQIA 2018, or where relevant, the findings which superseded the HEQIA 2018, as set out in the HEQIA Addendum, 2020.
 - Major positive or negative effect on one or more of the determinants of health or communities with protected characteristics, likely to change the findings of the HEQIA 2018 or HEQIA Addendum 2020 where superseded.
- 2.3 For clarity, the location of the HEQIA policy assessments against which the above points were considered are outlined in Table 2.

Table 2: Location of HEQIA policy assessment against which proposed changes were considered

Policy	HEQIA 2018	HEQIA Addendum 2020
DM1		
DM2		
DM3		
DM4		
DM5		
DM6		
DM7		
DM8		
DM9		
DM10		
DM11		
DM12		
DM13		
DM14		
DM15		
DM16		
DM17		
DM18		
DM19		
DM20		
DM21		
DM22		
DM23		
DM24		
DM25		
DM26		
DM27		
DM28		
DM29		

Policy	HEQIA 2018	HEQIA Addendum 2020
DM30		
DM31		
DM32		
DM33		
DM34		
DM35		
DM36		
DM37		
DM38		
DM39		
Dm40		
DM41		
DM42		
DM43		
DM44		
SA7		
SSA1		
SSA2		
SSA3		
SSA4		
SSA5		
SSA6		
SSA7		
H1		
H2		
H3		
E1		

- 2.4 Appendix A contains the appraisals where the proposed changes were found to result in a change to the previous HEQIAs findings.
- 2.5 The HEQIA 2018 and HEQIA April 2020 should be referred to for all remaining appraisals that have not changed since the HEQIA was undertaken at either draft stage or Proposed Submission stage. For clarity, the location of all final HEQIA appraisals, showing where the previous HEQIAs have been superseded, is shown in Table 3.

Table 3: Location of final HEQIA policy assessment

Policy	HEQIA 2018	HEQIA Addendum 2020	HEQIA Addendum 2022
DM1			
DM2			
DM3			
DM4			
DM5			
DM6			
DM7			
DM8			
DM9			
DM10			
DM11			
DM12			
DM13			
DM14			
DM15			
DM16			
DM17			
DM18			
DM19			
DM20			
DM21			
DM22			
DM23			
DM24			
DM25			
DM26			
DM27			
DM28			
DM29			

Policy	HEQIA 2018	HEQIA Addendum 2020	HEQIA Addendum 2022
DM30			
DM31			
DM32			
DM33			
DM34			
DM35			
DM36			
DM37			
DM38			
DM39			
DM40			
DM41			
DM42			
DM43			
DM44			
SA7			
SSA1			
SSA2			
SSA3			
SSA4			
SSA5			
SSA6			
SSA7			
H1			
H2			
H3			
E1			

Section 3: Summary of assessment of proposed changes to Development Management policies

3.1 This section summarises the consideration of proposed main and additional modifications to all Development Management policies. The changes to DM9, DM12 and DM13 were found to result in a change to the previous HEQIA assessment. The remaining HEQIA assessments remain unchanged.

Policy	Main or additional modifications	HEQIA implications
DM1	Main	Changes made to reflect Part M4(3) of the Building Regulations and Planning Practice Guidance on Housing. Changes strengthen impacts on housing and access pathways, however HEQIA already found these impacts to be positive effects. No implications on any individuals with protected characteristics. No change to HEQIA
DM2	None	n/a
DM3	Main	No change to HEQIA.
DM4	Main and additional	No change to HEQIA.
DM5	Main and additional	No change to HEQIA.
DM6	Additional	No change to HEQIA.
DM7	None	n/a
DM8	Main and additional	No change to HEQIA.
DM9	Main	Changes made to reflect changes to the use class order. Changes strengthen impact on access, services, lifestyle and health needs health pathways which are already considered positive. Inclusion of F2 uses could have positive implications for individuals with certain protected characteristics, including those who are less able to travel further, such as younger, older and those with certain health needs/disabilities. This changes the findings of the previous HEQIA assessment. HEQIA updated.
DM10	Main	No change to or impacts upon HEQIA. No implications on any individuals with protected characteristics.
DM11	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment health pathway and this is still considered to be the case. No implications on any individuals with protected characteristics.
DM12	Main	Changes made to reflect changes to the use class order. Changes weaken the impacts on the access and services health pathways, although are not considered to change the score. However, are considered to change the score from positive to no impact in relation to food access, and from no impact to positive for education and health provision. The policy is also considered to have positive implications for older and younger people, which was not reflected in the previous HEQIA. HEQIA updated.
DM13	Main	Changes made to reflect changes to the use class order. Changes weaken the impacts on the access and services

Policy	Main or additional modifications	HEQIA implications
		health pathways, although are not considered to change the score. However, are considered to change the score from positive to no impact in relation to food access, and from no impact to positive for education and health provision. The policy is also considered to have positive implications for older and younger people which was not reflected in the previous HEQIA. HEQIA updated.
DM14	Main and additional	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment, and amenities & leisure health pathways and this is still considered to be the case. No implications on any individuals with protected characteristics.
DM15	Main	Changes made to reflect changes to the use class order. No change to HEQIA. Changes strengthen impacts on income and employment, services, amenities and leisure, and environment health pathways however HEQIA 2018 already found these impacts to be positive effects. No implications on any individuals with protected characteristics.
DM16	Additional	No change to HEQIA.
DM17	None	n/a
DM18	Main	No change to HEQIA. Changes strengthen impact on environment health pathway which is already considered positive. No implications on any individuals with protected characteristics.
DM19	None	n/a
DM20	Main	No change to HEQIA.
DM21	None	n/a
DM22	Main	No change to HEQIA. Changes strengthen impact on environment and lifestyle health pathways which are already considered positive. No implications on any individuals with protected characteristics.
DM23	None	n/a
DM24	None	n/a
DM25	Main and additional	No change to HEQIA. Changes strengthen impact on environment health pathway which is already considered positive. No implications on any individuals with protected characteristics.
DM26	Main	No change to HEQIA. Changes strengthen impact on environment health pathway which is already considered positive. No implications on any individuals with protected characteristics.
DM27	Main	No change to HEQIA. Changes strengthen impact on environment health pathway which is already considered positive. No implications on any individuals with protected characteristics.
DM28	Main	No change to HEQIA. Changes strengthen impact in environment health pathway which is already considered

Policy	Main or additional modifications	HEQIA implications
		positive. No implications on any individuals with protected characteristics.
DM29	Main	No change to HEQIA. Changes strengthen impact on environment health pathway which is already considered positive. No implications on any individuals with protected characteristics.
DM30	Main	No change to HEQIA. Changes strengthen impact on services, amenities and leisure, and environment health pathways which are already considered positive. No implications on any individuals with protected characteristics.
DM31	Main	No change or impact on the HEQIA.
DM32	Main	No change to HEQIA. Changes strengthen impact on environment health pathway which is already considered positive. No implications on any individuals with protected characteristics.
DM33	Main and additional	No change to HEQIA. Main changes strengthen findings for various health pathways. No implications on any individuals with protected characteristics.
DM34	Main	No change to or impacts upon HEQIA. No implications on any individuals with protected characteristics.
DM35	Main	No change or impact on the HEQIA.
DM36	Main	No change to or impacts upon HEQIA. No implications on any individuals with protected characteristics.
DM37	Main and additional	No change to HEQIA. Changes strengthen the findings for the environment health pathway. No implications on any individuals with protected characteristics.
DM38	Additional	No change or impact on the HEQIA.
DM39	Main	No change to HEQIA. Changes strengthen the findings for the environment health pathway. No implications on any individuals with protected characteristics.
DM40	Main and additional	No change to HEQIA. Changes strengthen the findings for the health needs and environment health pathways. No implications on any individuals with protected characteristics.
DM41	Main	No change or impact on the HEQIA.
DM42	None	n/a
DM43	Main	Changes made reflect consideration of SUDs at an early design stage. Changes strengthen impacts on environment pathways, however HEQIA already found these impacts to be positive effects. No implications on any individuals with protected characteristics. No change to HEQIA
DM44	Main and additional	No change to or impacts upon HEQIA. No implications on any individuals with protected characteristics.
DM45	None	n/a
DM46	Main	No change or impact on the HEQIA.

Section 4: Summary of assessment of proposed changes to Special Area and Strategic Site Allocations policies

- 4.1 This section summarises the consideration of proposed main and additional modifications to all SA and SSA policies. None of the changes were found to result in a change to the previous HEQIA assessment.

Policy	Main or additional modifications	HEQIA implications
SA7	Main	No change or impact on the HEQIA.
SSA1	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment and health needs health pathways and this is still considered to be the case. Other changes strengthen the environment pathway. No implications on any individuals with protected characteristics.
SSA2	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment health pathway and this is still considered to be the case. No implications on any individuals with protected characteristics.
SSA3	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment and health needs health pathways and this is still considered to be the case. No implications on any individuals with protected characteristics.
SSA4	Main and additional	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment health pathway and this is still considered to be the case. Other changes strengthen the impacts on the environment health pathways. No implications on any individuals with protected characteristics.
SSA5	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment and services and amenities health pathways and this is still considered to be the case. Other changes strengthen the impacts on the access and environment health pathways, and strengthen positive impacts that improvements to access will have for people with limited mobility, as already identified in the HEQIA 2018. No further implications on any individuals with protected characteristics.
SSA6	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment and

Policy	Main or additional modifications	HEQIA implications
		services and amenities health pathways and this is still considered to be the case. No further implications on any individuals with protected characteristics.
SSA7	Main and additional	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment and services and amenities health pathways and this is still considered to be the case. No further implications on any individuals with protected characteristics.

Section 5: Summary of assessment of proposed changes to Site Allocations policies

- 5.1 This section summarises the consideration of proposed main and additional modifications to all Site Allocations policies. As the changes to H1, H2 and H3 resulted in a change in quantum of units being delivered, these policies were reassessed, although the reassessment did not result in a change to the previous assessment's findings. The remaining HEQIA assessment is unchanged.

Policy	Main or additional modifications	HEQIA implications
H1	Main	The number of sites and overall housing quantum to be delivered has changed. Although this is unlikely to change the results of the HEQIA, a revised assessment has been undertaken to ensure the HEQIA reflects the latest housing figures. Policy found to still have positive impacts for the housing pathway as should still lead to delivery of indicative 1231 residential units. No further implications on any individuals with protected characteristics.
H2	Main and additional	The number of sites and overall housing quantum to be delivered has changed. Although this is unlikely to change the results of the HEQIA, a revised assessment has been undertaken to ensure the HEQIA reflects the latest housing figures. Policy found to still have positive impacts for the housing pathway as should still lead to delivery of indicative 899 units. No further implications on any individuals with protected characteristics.
H3	Main	The number of sites and overall housing quantum to be delivered has changed. Although this is unlikely to change the results of the HEQIA, a revised assessment has been undertaken to ensure the HEQIA reflects the latest housing figures. The new requirements relating to protection of groundwater impact positively on the environment health pathway. Policy found to still have positive impacts for the housing pathway as should still lead to delivery of indicative 349 bedspaces. No further implications on any individuals with protected characteristics.

E1	Main	Changes made to reflect changes to the use class order. No change to HEQIA. HEQIA 2018 found this policy to have positive effects for the income and employment and services and amenities health pathways and this is still considered to be the case. Other changes have no further implications on the HEQIA. No further implications on any individuals with protected characteristics.
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Section 6: Conclusion

Summary of effects of changes

- 6.1 Overall, most of the proposed changes to the Proposed Submission policies are considered to either strengthen the policies or had a negligible impact on the findings of the HEQIA undertaken at earlier stages. Some of the changes resulted in a major positive impact on one or more of the health pathways and resulted in a change to the previous HEQIA; this was applicable for two policies (DM12 and DM13) in relation to education and health needs. However, conversely some of the changes to these policies resulted in an impact that was previously found to be positive to no longer be positive; this was applicable for two policies (DM12 and DM13) in relation to food access. In addition, some of the changes had positive effects for people with certain protected characteristics; this was applicable for policies DM9, DM12 and DM13.

Summary of overall effects

Housing, Accommodation and Community

- 6.2 The range of housing, accommodation and community development management policies, is inherently geared to not only address forecasted population growth in the city, but to also account for increasing life expectancy, an ageing demographic and residents with limited mobility or specialist needs.
- 6.3 Development management policies relating to the provision of new housing are geared to support healthy lifestyle choices, through provision of cycling infrastructure and promoting alternatives to car use. Policies also support the protection of important community facilities such as public houses to help preserve community identity and support community cohesion.
- 6.4 Potentially negative impacts are associated with facilitating natural population growth, and relate to increased demand for local education, healthcare and transport services. However, these are addressed through overlapping policy and further addressed through appropriate planning contributions (CIL and S106).
- 6.5 Overall the policies are considered to be inclusive, and could have particularly beneficial effects for older people or those with specialist needs.

Employment and Retail

- 6.6 The development management policies relating to employment and retail place importance on the retention of retail areas and markets as important community assets and generation of new business, employment, services and amenities for the public. As a result, health and wellbeing is supported through improving opportunities for social interaction and socio-economic circumstance. In addition, the employment and retail development policies support increasing demand on local healthcare services from population growth as D1 community uses (such as doctors and dentists) are to be permitted in retail centres.

- 6.7 Overall, the impacts from the construction and operation of all employment and retail development management policies are either neutral or positive, and are inherently inclusive and do not discriminate against any particularly sensitive protected characteristic.

Design and Heritage

- 6.8 The design and heritage development management policies contribute to the provision and retention of high quality urban environments which incorporate healthy urban design features and principles, supporting healthier more cohesive and vibrant communities. Examples include: improving social interaction and community cohesion; contributing to the development of safe neighbourhoods; improving provision of active transport infrastructure; and protecting valuable open space, recreational and leisure facilities to encourage a more active lifestyle and enhance wellbeing.
- 6.9 Overall, the impacts from the construction and operation of all design and heritage development management policies are either neutral or positive, and are again inherently inclusive and do not discriminate against any particularly sensitive protected characteristic.

Transport and Travel

- 6.10 The transport and travel development management policies ensure that there is an adequate response to the increasing transport demand within Brighton & Hove. BHCC supports infrastructure that would facilitate park and ride and encourages a switch to low emission vehicles which help to improve air quality within the city.
- 6.11 A primary focus of the policies is to improve road safety and encourage sustainable and active transport links, creating a modal shift away from private vehicles. This in turn helps to improve physical activity with social, mental and physical health benefits for all demographics; helps to improve healthy independent living for longer, and delays the onset of poor health and the need for care.
- 6.12 Overall, the impacts from the construction and operation of all transport and travel development management policies are either neutral or positive, and are inclusive in the way that they aim to ensure convenient access for pedestrians, cyclists and public transport users regardless of their level of personal mobility and do not discriminate against any particularly sensitive protected characteristic.

Environment and Energy

- 6.13 The environment and energy development management policies aim to protect Brighton & Hove's high-quality environment and as a result protect health and wellbeing through making good use of brownfield sites for development, protecting and enhancing green space and reducing pollution and nuisance. Such policies help mitigate against precursors to adverse health conditions (air quality, noise, land contamination), and also encourages social interaction and active lifestyles.
- 6.14 Overall, the impacts from the construction and operation of all environment and energy policies are either neutral or positive, and are inclusive in the way that they do not discriminate against any particularly sensitive protected characteristic. In addition, the policies could be beneficial for people who are otherwise vulnerable to poor air quality, such as younger, older and people with certain medical conditions.

Site Allocation Policies

Site Allocations

- 6.15 Overall, the impacts from the construction and operation of the site allocation policy is either neutral or positive, and are inclusive in the way that they do not discriminate against any particularly sensitive protected characteristic.

Strategic Site Allocations

- 6.16 The Strategic Site Allocations, Housing Sites and Other Site Allocations are largely neutral or positive where residual impacts relate to where there may be a potential impact on amenities or employment during the construction phase.
- 6.17 In each case, the allocations are inherently inclusive and do not discriminate against any particularly sensitive or protected community characteristic.

Conclusion

- 6.18 CPP2 represents a comprehensive and inclusive suite of policies geared to fostering a healthy, vibrant, cohesive and sustainable population.

Appendix A: HEQIA assessments of proposed changes to policies DM9, DM12, DM13, H1, H2 and H3

DM9: Community Facilities	<i>Planning permission will be granted for new or improved community facilities in Regional, Town, District and Local Centres in accordance with Policy DM12 and in other locations where all of the following criteria are met: a) the proposed use is compatible with adjoining and nearby uses; b) the site is close to the community it serves and is readily accessible by walking, cycling and public transport; and c) where feasible and appropriate, community facilities have been co-located to maximise their accessibility to residents and reduce the need for travel (for example at Community Hubs).</i> <i>Development that would lead to the loss of community facilities will only be permitted where it has been demonstrated that at least one of the following circumstances applies: a) replacement facilities of an appropriate quality and size will be provided as part of new development proposals or in an alternative suitable location that meets the criteria in part 1 of this policy; or b) the facility is no longer needed and suitable alternative provision with sufficient capacity is available in a location easily accessible to users of the facility; or c) the building or land is no longer suitable to accommodate the current use or any alternative suitable community use and cannot be reasonably adapted to do so; or d) it has been demonstrated that there is no current or future need or demand for the space, either in its current use or any alternative community use and evidence of active, flexible and appropriate marketing of the site for community use has been provided. Partial loss of floorspace through change of use will be supported when the operational need of the community use requires less floorspace or in order to sustain the viability of the existing use by cross-subsidy.</i>				
Demography	This policy will not influence demography.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy seeks to retain and enhance the availability and accessibility of community facilities and amenities, thereby supporting community needs and benefitting income and employment.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	The policy does not constrain the definition of community facilities, instead offering a range of examples, enabling flexibility that can be tailored to the varying needs of local communities, including education.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy will not influence housing.	0	0	Inclusive.	No additional recommendations.

				No particularly sensitive protected characteristic.	
Transport	This policy will not influence transport.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	The policy ensures that all community facilities will be readily accessible by walking, cycling and public transport and where feasible will be co-located to maximise their accessibility to residents and reduce the need for travel. F2 uses, in particular isolated shops, further supports this.	0	+	Inclusive. Could be beneficial to those who are less able to travel, including younger, older and those with health needs or disabilities.	No additional recommendations.
Services, Amenities and Leisure	The policy seeks to retain and enhance the availability and accessibility to amenities and facilities.	0	+	Inclusive. No particularly sensitive protected characteristic	No additional recommendations.
Lifestyle	The policy seeks to retain and enhance the availability and accessibility to amenities and facilities, important to maintaining good health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	The policy does not materially influence demography and seeks to retain and enhance the availability and accessibility to amenities and facilities, important to maintaining good health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Environment	Any major construction has the potential to impact local amenity (from air quality and noise pollution, and in this case a potential loss of views/ landscape). Once operational, the policy will not directly impact on the quality of the urban environment.	0	+	Inclusive. No particularly sensitive protected characteristic.	Environmental construction issues will be addressed at project level, subject to DM39/ CP18, and are likely to be further assessed through an appropriately scoped EIA and or HIA. No additional recommendations.
Food Access	This policy will not influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	The policy seeks to retain and enhance the availability and accessibility of community facilities and amenities, thereby supporting community cohesion through placement of key community resources and the development of social capital.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Health Determinant	Health Pathway	Potential Health Outcome		Protected Characteristics	Recommendation/ Comments
DM12: Regional, Town, District and Local Shopping Centres	<i>Commercial, business and service uses (use class E), learning and non-residential institutions (use class F1) and local community uses (use class F2) will be supported within the city’s defined Regional, Town, District and Local Centres (as set out in CPP1 policy CP4 and as shown on the Policies Map).</i> 1. <i>Proposals for other uses will be permitted where it can be demonstrated that the scheme meets all of the following criteria;</i> <i>a) The proposal will maintain and enhance the vitality, viability and the character of the shopping area;</i> <i>b) The proposal will retain active ground floor uses and frontage and provide a direct service or sales to visiting members of the public;</i> <i>c) The proposed development or uses will not have a harmful impact on the amenity of local residents due to noise, odour, disturbance or light pollution (see DM21, DM40); and</i> <i>d) Where appropriate shop front design should be in accordance with the council’s shop front policy (see DM23).</i> 2. <i>In addition to criteria a-d) above, proposals within the Lanes and North Laine areas of the Regional Centre should not result in the amalgamation of three or more adjoining units resulting in an overly dominant unit, in order to retain the unique character of the area.</i> 3. <i>Residential use may be appropriate above or to the rear of units in shopping centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved.</i> 4. <i>Temporary and ‘meanwhile’ use of vacant buildings and sites by start-up businesses as well as creative, cultural and community organisations will be considered supported particularly where they help activate and revitalise retail centres and can generate increased footfall.</i>				
Demography	This policy will not influence population number, composition or structure.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy seeks to retain and enhance Brighton & Hove’s service economy and associated direct, indirect and induced employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Education	This policy supports F1 uses within centres, which could include learning type facilities.	0	+0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy does allow change of use to residential and may have positive impacts on housing provision.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not directly influence transport. Support for local centres might remove the need for transport to larger retail areas.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Crime and Safety	This policy will not influence crime.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to maintain and sustain access and accessibility to a range of facilities and resources.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility as well as those that cannot travel further, such as younger and older people.	No additional recommendations.
Services, Amenities and Leisure	This policy seeks to maintain and sustain access and accessibility to a range of facilities and resources.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility as well as those that cannot travel further, such as younger and older people.	No additional recommendations.

Lifestyle	This policy will not materially influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	The policy supports all E uses; this includes health type uses.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	This policy will not materially impact upon the urban environment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Food Access	Although the policy supports all E uses which could include food stores, it no longer seeks to retain certain types of E use, due to changes to the use class order. No impact on this objective.	0	0	Inclusive No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	The policy seeks to retain and maintain valuable community assets important to health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

DM13: Important Local Parades	9 areas designated as ILPs. Commercial, business and service uses (E Use Class) will be supported within Important Local Parades. Proposals for other uses will be permitted where it is demonstrated that the scheme meets the following criteria: a) The proposal will maintain and enhance the vitality, viability and the character of the Important Local Parade; b) The proposal will retain an active ground floor use and frontage and provide a direct service or sales to visiting members of the public;
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	c) <i>The proposed development or use(s) will not have a harmful impact on the amenity of local residents, due to noise, odour, disturbance or light pollution; and</i> d) <i>Where appropriate shopfront design should be in accordance with the council's shop front policy (DM23).</i> <i>Changes of use at ground floor to residential will be permitted to the rear or on upper floors in Important Local Parades.</i> <i>Temporary and 'meanwhile' use of vacant buildings by start-up businesses as well as creative, cultural and community organisations will be supported where they help activate and revitalise parades and can generate increased footfall.</i>				
Demography	This policy will not influence population number, composition or structure and is more geared to retaining and enhancing valuable community assets.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy seeks to support Brighton & Hove's economy and associated direct, indirect and induced employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy does allow change of use to residential and may have positive impacts on housing provision.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not directly influence transport, however support for ILPs might remove the need for transport to larger retail areas.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to maintain and sustain access and accessibility to a range of services and facilities.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility as well as those that cannot travel further, such as younger and older people.	No additional recommendations.
Services, Amenities and Leisure	This policy seeks to maintain and sustain access and accessibility to a range of services and facilities.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility as well as those that cannot travel further, such as younger and older people.	No additional recommendations.
Lifestyle	This policy will not influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	The policy supports all E uses; this includes health type uses which can help to meet health needs.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	This policy will not materially impact upon the urban environment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Food Access	Although the policy supports all E uses which could include food stores, it no longer seeks to retain certain types of E	0	0	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.

	use, due to changes to the use class order. No impact on this objective.				
Community Cohesion	The policy supports community-type meanwhile uses as well as supports other uses within ILPS which could be important to health, wellbeing and community cohesion.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

H1: Housing and Mixed- Use Sites	The sites listed are allocated for housing (Use Class C3) or mixed-use development including housing and other specified uses. Planning permission will be granted for proposals that accord with the Development Plan and which provide indicative amounts of development shown in the tables. The following additional criteria apply to certain sites where indicated: - For sites marked with an omega (Ω), occupation of the development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider; - For sites marked with a hash (#), the layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.				
Demography	This policy identifies the opportunity to develop 33 sites which will facilitate natural population growth.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy includes the provision of several mixed-use sites including business and employment floorspace, and commercial use which will provide a variety of short and long term direct, indirect and induced employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy has the potential to increase the demand for educational facilities, as well as the capacity for education provision in the area.	0	+	Inclusive. No particularly sensitive protected characteristic.	Change in demand addressed through CIL and S106. No additional recommendations.

	However, this is addressed through CIL.				
Housing	This policy will provide an indicative 1231 new residential units, key to meeting housing targets, and accommodating natural population growth.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy is likely to result in increased transport demand within the areas. However, addressed through overlapping policy.	0	+	Inclusive. No particularly sensitive protected characteristic.	Sustainable/ active travel further addressed through Policy DM32 and also CP9 of CPP1. No additional recommendations.
Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy will not directly influence access and accessibility.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy will facilitate population growth, and with it demand for services, amenities and leisure, however, this is addressed more broadly through the DM policies.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	This policy will not directly influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy is not anticipated to influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Environment	Any major construction has the potential to impact local amenity (from air quality and noise pollution). However, developments will comply with environmental objective levels set to protect health. Once operational, homes will be compliant with the DM policies ensuring housing design, suitability and quality. Requirements relating to protection of water supply supports provision of clean water.	0	+	Inclusive. No particularly sensitive protected characteristic.	Environmental construction issues will be addressed at project level, subject to DM39/ CP18, and are likely to be further assessed through an appropriately scoped EIA and or HIA. No additional recommendations.
Food Access	This policy is not anticipated to directly influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy is not anticipated to directly influence community cohesion.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

H2: Urban Fringe Housing Sites	<i>The developable areas of the sites listed are allocated for housing development (Use Class C3). Planning permission will be granted for proposals that accord with the Development Plan (having particular regard to Policies SA4 and SA5) and which meet the indicative site/development requirements in Table 7 and all of the following criteria: a) Provision is made for 3+ bedroom family-sized dwellings in accordance with provisions the indicative percentages set out in Table 7; b) Opportunities to secure additional and /or improved publicly accessible open space provision are incorporated within the proposed scheme; c) Green infrastructure and local food growing opportunities are incorporated within the proposed scheme; d) Development will mitigate any adverse impacts on designated sites and provide biodiversity net gains in accordance with Policies CP10 and DM37;e) Provision is made for sustainable transport infrastructure improvements that provide and promote sustainable transport and improved safe pedestrian and cyclist access to and through the site to support the development; f) Improved linkages and access to the South Downs National Park and surrounding areas are secured where feasible; and)g) Appropriate regard is given to the need for local community facilities; h) Given the council's ambition to become a carbon neutral city by 2030, development will be encouraged to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency</i>
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	<i>measures and low and zero carbon technologies, in accordance with Policy DM44.i) Provision is made for a proportion of serviced plots for self and/ custom build dwellings unless it can be demonstrated that this would make the scheme unviable.</i> <i>The following additional criteria apply to certain sites where indicated:</i> <i>For sites marked with an omega (Ω), occupation of the development should be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider;</i> <i>For sites marked with a hash (#), the layout should be planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.</i>				
Demography	This policy includes the development of 15 sites for residential units, which will facilitate natural population growth and accommodate the needs for a wide demographic.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy seeks to improve housing stock, type and quality.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will facilitate population growth, and with it, a proportionate increase in local education demand. However, this is addressed through the overlapping DM policies and CIL.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy will provide an indicative 899 residential units and also 3+ bedroom family-sized dwellings which will influence the quality, number, type and size of housing in the area.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy is likely to result in increased vehicular traffic in the area as well as increased demand for public transport, this is however addressed through the overlapping DM policies. Policy supports sustainable transport infrastructure which could be beneficial for health.	0	+	Inclusive. No particularly sensitive protected characteristic.	Sustainable/ active travel further addressed through Policy DM32 and also CP9 of CPP1. No additional recommendations.

Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to improve access and accessibility to housing, public open space and the South Downs National Park.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy includes the provision of local community facilities and improves public open space. The loss of any community amenities or open space is addressed through the overlapping DM policies.	0	+	Inclusive. No particularly sensitive protected characteristic.	Loss of any community amenities and facilities is addressed through the overarching DM policies that seeks to minimise, replace and or enhance such amenities and facilities through development. No additional recommendations.
Lifestyle	This policy will present the opportunity to improve lifestyle choices by providing improved access to housing, public open space and the South Downs National Park, which could enable recreational activities and encourage a more active lifestyle.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy is not anticipated to influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	Any major construction has the potential to impact local amenity (from air quality and noise pollution). However, developments will comply with environmental objective levels set to protect health.	0	+	Inclusive. No particularly sensitive protected characteristic.	Environmental construction issues will be addressed at project level, subject to DM39/CP18, and are likely to be further assessed through an appropriately scoped EIA and or HIA.

	Once operational, this policy should ensure ecological impacts are mitigate. Requirements relating to protection of water supply supports provision of clean water.				
Food Access	This policy seeks to improve local food growing opportunities by incorporating this within the proposed scheme.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy seeks to develop housing to complement and enhance host communities.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

H3: Purpose Built Student Accommodation- Lewes Road Bus Garage	<i>The Lewes Road Bus Garage site and 39 - 47 Hollingdean Road as shown on the Policies Map are allocated for new purpose-built student accommodation (PBSA) development. Planning permission will be granted for proposals that accord with the Development Plan and which provide the indicative amounts of development shown in the table.</i>				
Demography	This policy includes the provision of an indicative 349 bedspaces for students, and will increase the proportion of students in the area, thereby influencing the number, structure and composition of the population.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	In accordance with Policy DM7, all purpose-built student accommodations will maintain an effective 24-hour staffing/security presence, therefore providing long-term income and employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	Further addressed in Policy DM7, no additional recommendations.

Education	This policy is not anticipated to directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy will provide new student accommodation which in combination with the wider DM policies will aid in reducing pressure on existing housing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy has the potential to influence transport demand due to the increased student presence. However, Policy DM7 includes measures to encourage sustainable transport including discounted bus tickets.	0	+	Inclusive. No particularly sensitive protected characteristic.	Sustainable/ active travel further addressed through Policy DM32 and also CP9 of CPP1. No additional recommendations.
Crime and Safety	In accordance with Policy DM7, 24-hour on-site security will be required, which will increase safety and potential dissuade crime in the surrounding local area.	0	+	Inclusive. No particularly sensitive protected characteristic.	Further addressed in Policy DM7. No additional recommendations.
Access and Accessibility	This policy is not anticipated to directly influence access and accessibility.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy includes the provision of local community facilities and improves public open space.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	This policy is not anticipated to influence lifestyle.	0	0	Inclusive.	No additional recommendations.

				No particularly sensitive protected characteristic.	
Health Needs	This policy is not anticipated to influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	Any major construction has the potential to impact local amenity (from air quality and noise pollution). However, developments will comply with environmental objective levels set to protect health.	0	0	Inclusive. No particularly sensitive protected characteristic.	Environmental construction issues will be addressed at project level, subject to DM39/ CP18, and are likely to be further assessed through an appropriately scoped EIA and or HIA. No additional recommendations.
Food Access	This policy is not anticipated to influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy is not anticipated to directly influence community cohesion.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.



Brighton & Hove
City Council