



**Brighton & Hove City Council**  
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BN1 1JE

Mr Rob Shepherd  
Unknown

FOI Reference: 1505435

Direct Dial: 01273 295959

Email: xxxxxxxx@xxxx.xxxxxxxxxxxxxx.xxx.x

Date: 6 July 2018

Your reference:xxxxxxxxxxxxxxxxxxxxxx@xxxxxxxxxxxxxx.xxx

Dear Mr Shepherd

## Freedom of Information Act 2000

Please see below our response to your Freedom of Information request. Some of the information is exempt as follows;

Under section 21 (1) of the Freedom of Information Act (FoIA), we are not required to provide information in response to a request if it is already reasonably available by other means.

Where indicated, the information you requested is available on our website using the links below. If you do not have access to the internet at home, you may be able to use facilities at your local library.

## ***The City Plan 2012 Consultation, Review and Effectiveness***

***The City Plan 2012 was based on educated professional assumptions about changes that will occur between 2012 and 2030.***

***What checks were made before the 2018 current round of consultation on City Plan 2 to ensure its fundamental assumptions were still valid?***

***What is the process by which local people and residents' groups can ensure the City Plan recognises changes and evolves to take into account changing circumstances?***

***(i.e. to ensure it is a "living plan")***

***What quantitative (as opposed to qualitative) measurements have been made to check the City Plan is delivering its expected benefits?***

***(e.g. Rottingdean 2017 AQMA actual NO2 versus planned NO2 levels? A259 traffic congestion levels versus 2030 predictions?).***

The City Plan Part 1 was submitted for examination in June 2013. The City Plan Part 1 was examined by an independent planning Inspector who found the Plan sound against the government tests of soundness and legal compliance. The City Plan Part One was adopted by the council in 2016.

The City Plan Part 1 is accompanied by an Implementation and Monitoring Plan (Annexe 1 ) –

<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20annex%201%20%28mar%202016%29.pdf>

setting indicator and monitoring targets in order to monitor how the implementation of policies in the City Plan is progressing. Monitoring is reported annually through the Authority Monitoring Report (prepared annually to meet the requirement of section 35 of the Planning and Compulsory Purchase Act 2004 and Localism Act 2011 amendments and section 34 of The Town and Country Planning (Local Planning) (England) Regulations 2012). The latest AMR can be viewed here:

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/planning-authority-monitoring-report-amr> .

Appendix 1 of the AMR sets out the quantitative air quality monitoring results which is undertaken by the council. The Air Quality Annual Status Reports can be found on this section of the council's website:

<https://www.brighton-hove.gov.uk/content/environment/noise-and-pollution/air-quality-management-city>.

The city's Air Quality review and Assessments maps pollution spatially it does not attempt to predict future air quality.

The council's 2013 City Plan Part 1 Submission was supported by a Strategic Transport Assessment [STA], in line with planning guidance for the preparation of Local Development Frameworks. The 2013 STA document was a key background document which informed the draft City Plan Part 1 and was part of the evidence that was available, and referred to, as part of the Examination in Public.

The 2013 STA was undertaken using a computer-based transport model, and assessed the possible transport implications of all the proposed development in the Plan, and any proposed citywide mitigation measures, by forecasting out to 2030. It therefore assessed the cumulative effects of all planned development, and can be found here:-

<http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%26%20Hove%20City%20Plan%20-%20Final%20Transport%20Assessment%20including%20Appendix.pdf>

Following the 2014 Urban Fringe Assessment, the STA was revised to account of the additional implications of the UFA conclusions. It was republished as an Addendum Report to the May 2013 Strategic Transport Assessment in June 2014, and can be found here:-

[http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Transport%20Assessment%20Addendum%20Report%20%28June%202014%29%20FINAL\\_0.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Transport%20Assessment%20Addendum%20Report%20%28June%202014%29%20FINAL_0.pdf)

Under proposed changes to National Planning Policy Framework there is a requirement for local authorities within five years of adoption to assess whether the plans are up to date and outline a programme for reviewing plans/ policies within plans where the council consider them to be out of date/ no longer comply with government policy.

As part of any review of the City Plan Part 1, the council would then consider what background information it would require and need to update, such as the Strategic Transport Assessment, in order to assist with the development of a new or revised plan.

The city council is currently consulting on the draft City Plan Part 2 (July 5<sup>th</sup> – September 13<sup>th</sup> 2018). The purpose of the City Plan Part 2 is to support the implementation and delivery of the strategy set out in the adopted City Plan Part One through additional site allocations and a suite of detailed development management policies.

The draft City Plan Part Two sets out the council's preferred approach and includes proposed site allocations for housing and other uses such as employment and community facilities and contains a suite of development management policies which will be used to assess planning applications (including those that relate to transport and travel and air quality)

The draft CPP2, supporting documents and background evidence documents that support and have informed the draft Plan can be found on this section of the council's website:

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two>

This consultation provides the opportunity for local people and residents to comment on the council preferred approach and comments received will help inform the final version of the City Plan Part two.

Please quote the reference number 1505435 in any future communications.

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date of receipt of the response to your original letter and should be addressed to:

[xxxxxxxx@xxxx.xxxxxxxxxxxxxx.xxx.xx](mailto:xxxxxxxx@xxxx.xxxxxxxxxxxxxx.xxx.xx)

or by post to;

Information Governance Team  
Brighton & Hove City Council  
4th Floor, Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JE

If you are still dissatisfied with the Council's response after the internal review you have a right of appeal to the Information Commissioner at:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF.  
Telephone: 01625 545 700  
Website: [www.ico.gov.uk](http://www.ico.gov.uk)

We will now close your request as of this date.

Yours sincerely

Information Compliance Officer