

Environmental Consultation Document.**9. ENVIRONMENTAL POLICIES****9.1 Overview**

From the Inaugural and Visions meetings in November 2022, the Forum identified 'environment and green spaces' as a top priority for the Plan. Government guidance includes the Environment Green Paper and the National Planning Policy Framework, recently amended in December 2023, which emphasise sustainable development and environmental protection, especially for Green Belt land. The Environmental Land Management Scheme (ELMS) is particularly relevant, focusing on nature recovery. Our research has involved key bodies including, Natural England, the Environment Agency, the Forestry Commission, Brighton & Hove City Council (BHCC), the South Downs National Authority, Sussex Wildlife Trust and Sir David Attenborough. We are also grateful for the Biological Survey and assessment of land at Varley Park prepared by an expert in 2018, and published in January 2020, before the Forum was formed, and which was passed to the Forum by Coldean Community Organisation which has informed some of the policies proposed in this Plan

Working with BHCC is crucial, considering their commitments to carbon-neutral housing, sustainable development, and planning policies. Engaging with local organisations, such as Coldean Community Organisation (CCOrg) and Coldean Residents' Association, strengthens Coldean's community ties. Preservation efforts extend to nature recovery, with a detailed Nature Recovery Strategy already available within Coldean Community Organisation.

The Neighbourhood Plan therefore aims to address climate resilience, identifying specific risks like flooding and aquifer sustainability. Coldean's heritage is not overlooked, with plans to continue to engage local experts and protect historical assets such as ancient chalk grassland. Sustainable design is a key objective, adopting low-carbon, environmentally sensitive development criteria.

The Nature Recovery Plan by CCOrg highlights the significance of ancient chalk grasslands in Coldean, providing a roadmap for restoration, especially for Site 21a, north of Varley Halls. The Stanmer-Coldean Community Land Trust Project also proposes a collaborative effort for long-term protection of biodiversity, emphasising community engagement and social value. This plan aligns with BHCC's commitment to ecological and social issues, offering opportunities for education, community involvement, and nature observation.

In summary, the Neighbourhood Plan for Coldean prioritises environmental protection, sustainable development, and community engagement, aligning with both government guidance and local initiatives for a comprehensive approach to planning.

The review of Open Spaces and in particular protection of green spaces and especially Site 21a and Site 21c, around Varley Halls is dealt with in a separate part of this Plan, at Section 4, and has already been agreed by Forum members (in July 2023). Where it has been possible to designate these and other areas in Coldean as Green Belt areas under the NPPF framework to protect such open spaces from future development this has been done; or alternatively Spaces of Community Value are also designated and the NPPF confers some protection on those, as set out in Section 4 of this Plan.

Policy

It is a priority in the Plan for Coldean is to retain, enhance and protect the high quality open space within and around the edges of Coldean, recognising that all parks, open spaces and wildlife areas make an important contribution to Coldean's green infrastructure and quality of life.

9.2 South Downs Way Ahead Nature Improvement Area

Much of the land in and around Coldean is situated within the South Downs Way Ahead Nature Improvement Area. More information regarding this can be found at <https://www.southdowns.gov.uk/wp-content/uploads/2016/02/CaseStudy-South-Downs-Way-Ahead-NIA.pdf>. This initiative has multiple objectives, however, the key objectives for Coldean Area are:

- a) 'Linking the Fragments' - to achieve real improvements to conservation and management of chalk grassland at the heart of the matrix of downland habitats. Coldean Residents are already actively improving or preserving special sites and areas in Coldean.
- b) 'Town to Down' - to assess and demonstrate the benefits of ecosystem services to urban populations. Coldean is easily accessible by bus links to the whole population of Brighton & Hove, who can access South Downs National Park through and from Coldean.
- c) 'Valuing the Chalk' - clearly an environmental, economic and social value has been attributed to the benefits and services provided by chalk downland, which residents are seeking to preserve for this, and future generations

These initiatives should strengthen any arguments against future development of the land in and around Coldean - more specifically Site 21a.or Site 21c.

The Forum also references 'CP10 Biodiversity' and 'CP16 Open Space' of Brighton & Hove Council's City Plan 01. If for some reason the Green Belt designations in Section 4 of this Plan are ignored these require any development to minimise and mitigate any negative impact on biodiversity of the wider and immediate area. In addition Policies 'DM37 Green Infrastructure and Nature Conservation', 'DM38 Local Green Spaces', 'DM40 Protection of the Environment and Health - Pollution and Nuisance', and 'DM42 Protecting the Water Environment' of the Brighton & Hove City Plan 02 are applicable .

Coldean Area is also affected by and within the Brighton & Hove Urban Fringe Assessment dated June 2014. BHCC Policy H2 on Housing Sites - Urban Fringe in the Brighton & Hove

City Plan 02 states that planning permission will be granted for proposals that accord with the Development Plan (having particular regard to Policies SA4 and SA5) and which address all of the site considerations. Site 21a (Land North of Varley Halls) had been identified as having housing potential for a high density scheme - approx. 50 dwellings. Site 21c (Land South of Varley Halls, ie allotments) had also been identified as having potential for housing, approx. 7 dwellings. There is a key discrepancy between policies in City Plan 01 (which is currently being updated and amended) and City Plan 02. The Council is keen to promote green space and the surrounding National Park and encourages biodiversity conservation and enhancements, yet, opens the door to development by stating, “adverse impacts of development can be appropriately mitigated and compensated for”. The Forum would argue any further development around Varley Halls sets a poor precedent and would significantly harm the National Park. The precedent set by the failure of the Council to spend any s106 monies from the Bluebell Heights Development on Coldean to date, does not encourage Coldean to accept any similar promises for any new development in Site 21a or 21c.

9.3 The National Planning Policy Framework

This was updated by Michael Gove’s Dept of Levelling Up, Housing and Communities in December 2023. In terms of this section of the Neighbourhood Plan and also the Open Spaces section, Section 4, the following updated sections of the NPPF refer: Section 13 Protecting Green Belt Land and Section 15 Conserving and Enhancing the Natural Environment.

Policies

*Settlement Containment Proposals for development of and to the North of Coldean, more specifically proposals for development of land around Varley Halls - outside of the built up area boundary as identified on the proposals map, will not be supported.

* When this Plan is adopted Proposals for development within this area of countryside would only be permitted where:

1. The open space and undeveloped feel of the land is not compromised;
2. The separate identity of the settlements is maintained;
3. The landscape setting of the settlements will not be harmed;
4. It does not add to existing sporadic or isolated development;
5. It does not encourage or lead to settlement coalescence.
6. Valued views of the South Downs National Park are identified for protection. Any proposals for development that would affect the views should demonstrate that design has taken into consideration and public views can be protected for public enjoyment.
7. Protection of Green Spaces Development that results in the loss of green spaces identified in Section 4, or that results in any harm to their character, setting, accessibility, appearance, general quality or amenity value would only be permitted if the community would gain equivalent benefit from the provision of suitable replacement green space or gain actualised, significant social, economic, or environmental benefits from an alternative facility.
8. Allotments. Any proposals that result in harm to or loss of allotments in Coldean will not normally be permitted unless:

A. Replacement provision be made, of at least equivalent quality, where it would be located at reasonable convenience for the existing plot holders, or;

B. Where clear and significant social, economic, and environmental community benefits could be derived from the proposal.

9. Adapting to Climate Change. All new development within Coldean should seek to achieve high standards of sustainable development and in particular, demonstrate in proposals how design, construction and operation has sought to:

A. Reduce the use of fossil fuels;

B. Promote the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy;

C. Adopt and facilitate the flexible development of low and zero carbon energy through a range of technologies as set out in the Coldean Design Code which is part of this Plan (See Section 6 of this Plan).

D. Link the provision of low and zero carbon energy infrastructure in new developments to existing buildings;

E. Adopt best practice in suitable urban water supply and drainage.

9.4 Biodiversity Findings.

The Biodiversity Survey and Assessment conducted in 2018 to assess and provide recommendations for development in the Coldean area (the Biological Survey is accessible on the CNPF website at link...) found several invertebrate species with conservation status in the Area.

The author was asked to survey, assess and provide recommendations for the different areas/habitats within the site. There were also found three England Red Listed plant species. The chalk grassland open spaces were the most biodiverse for plants and invertebrates including those with conservation status. The woodland areas had a range of fungi, birds, molluscs and lower plants. There were also Song Thrushes and Mistle Thrushes recorded within the woodland areas.

Four Ancient Woodland Indicators were recorded, including Spurge-laurel. Unfortunately, it was in the process of being cut down, possibly due to it being mistaken for Rhododendron or Cherry Laurel. It is however native, and the most interesting species in Coldean woods.

9.5 Ancient Chalk Downlands

As the Area contains rare Ancient Chalk downlands, especially around the Hollingbury Hillfort area, the occupation of which created these downlands and grazing areas several thousand years ago, these chalk downlands should additionally be preserved and protected as follows:-

Policies

*Biodiversity Conservation: Implementation of measures to protect and enhance the diversity of plant and animal species specifically in chalk grassland areas, including the

preservation of rare and endemic species through habitat restoration and conservation programs, as with Site 21a Recovery Programme.

*Sustainable Grazing Practices: Promoting and enforcing sustainable grazing practices that maintain a balance between the ecological health of the chalk grassland and the agricultural needs of livestock, preventing overgrazing and soil degradation.

* Invasive Species Management: Developing and implementing strategies to control and eradicate invasive plant species that threaten the native biodiversity of chalk grasslands, preventing their spread and ensuring the resilience of the ecosystem. This, for example, has been occurring with regular management of invasive species at Site 21a.

*Habitat Restoration: Supporting initiatives for the restoration of degraded chalk grassland habitats, including reseeded native plant species, erosion control, and the removal of barriers that impede natural processes such as water flow.

*Water Resource Management: Implementing measures to conserve and protect water resources in chalk grassland areas, including the prevention of pollution, sustainable water use practices, and the preservation of watercourses crucial for the ecosystem.

*Public Awareness and Education; For example through this Plan it may be possible to encourage and establish local educational programmes to raise awareness about the importance of chalk grasslands, their unique biodiversity, and the role individuals can play in preserving and respecting these environments. This can also encourage responsible recreational activities that minimise human impact on these fragile ecosystems.

9.6. Brighton & Hove Council's Carbon Neutral 2030 plan and tree planting.

Brighton & Hove Council's Carbon Neutral 2030 plan can be accessed in full on the BHCC website ([link here](#))

The Brighton & Hove tree planting plan supports the 2030 Carbon Neutral Programme. It will enable planting of a variety of species with greater resilience to pests and disease, and work with residents of planting trees in local communities. Strategically placed tree planting can make a huge impact on the character and quality of an area. It can also help to mitigate the impacts of climate change by helping cool the more urban areas. Identifying streets through community engagements to see where they would like to see more planting in their areas is an ongoing process. This is encouraged with replacement and new tree-planting in the Coldean Woods area.

Policy

This Plan encourages planting of suitable species of new and replacement trees in the Area, in addition to any tree planting organised by the Council.

9.7 Zero Carbon Buildings

Environmentally friendly approaches to building design and decarbonisation of buildings have been addressed in the Section 6 the Design Codes section within this Plan.

9.8 Traffic Management and decarbonisation

Environmentally friendly approaches to traffic management and decarbonisation of traffic has been addressed in the Section 7 , the Traffic Management section within this Plan.