

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

# **Toad's Hole Valley**

## **Supplementary Planning Document**

### **Draft SPD consultation report**

May 2017

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### 1. About this report

- 1.1. This report summarises the findings of the consultation on the draft Toad's Hole Valley Supplementary Planning Document (SPD) conducted by Brighton & Hove City Council's Policy, Projects and Heritage team.
- 1.2. This draft SPD is the second stage of a two-step process to prepare planning guidance as referred to in City Plan Part One Policy DA7 Toad's Hole Valley.
- 1.3. The aim of the consultation was to gather views from individuals, statutory planning consultees and businesses and organisations from across the city on how an SPD could best support the successful delivery of development on this strategic greenfield site.
- 1.4. The findings of this consultation have informed the final version of the SPD; and the adoption of this document will be sought from the council's Economic Development & Culture Committee in June 2017.

## **2. Summary of findings**

- 2.1. The council received 138 representations half of responses were received via the council's online Consultation Portal (69) and the other half via email (68), with one response being received by hand (1). For a transcript of all representations please see Appendix 1.
- 2.2. The sections and topics outlined in the Draft SPD that attracted most comments are outlined below with a summary of the comments made:

### **Transport and travel**

- Importance of reducing impact of THV development on quality of life, road network, air pollution, noise and/or road safety and/or traffic flow upon neighbouring areas and the need to get transport assessment and/or road design, access points and/or mitigation costs right;
- Importance of providing sufficient parking at THV to avoid added pressure/overspill into surrounding areas;
- Suggestions put forward regarding road network, road safety and traffic flow including creating room for buses and/or cycles;
- Importance of delivering improved, new links to SDNP, neighbouring areas and/or city centre in particular for pedestrians and cyclists; and
- Need for public transport improvements to be designed in and secured as early as possible in the development process.

### **Housing**

- Support for 40% affordable provision; and
- Concern that density, height and/or numbers identified for THV are not in keeping with surrounding neighbourhoods.

### **Materplanning and landscape-led design**

- Support for a garden city / green suburb design approach for the neighbourhood.

### **Public realm and blue-green infrastructure**

- Support for securing SNCI restoration/long-term maintenance arrangements and/or protecting wildlife and/or delivering Biosphere objectives; and
- Important that the appropriate amount of park area, open spaces, children play and outdoor sports facilities are provided in the right places, are safe and/or for all age groups as part of a network connecting communities in and around the development.

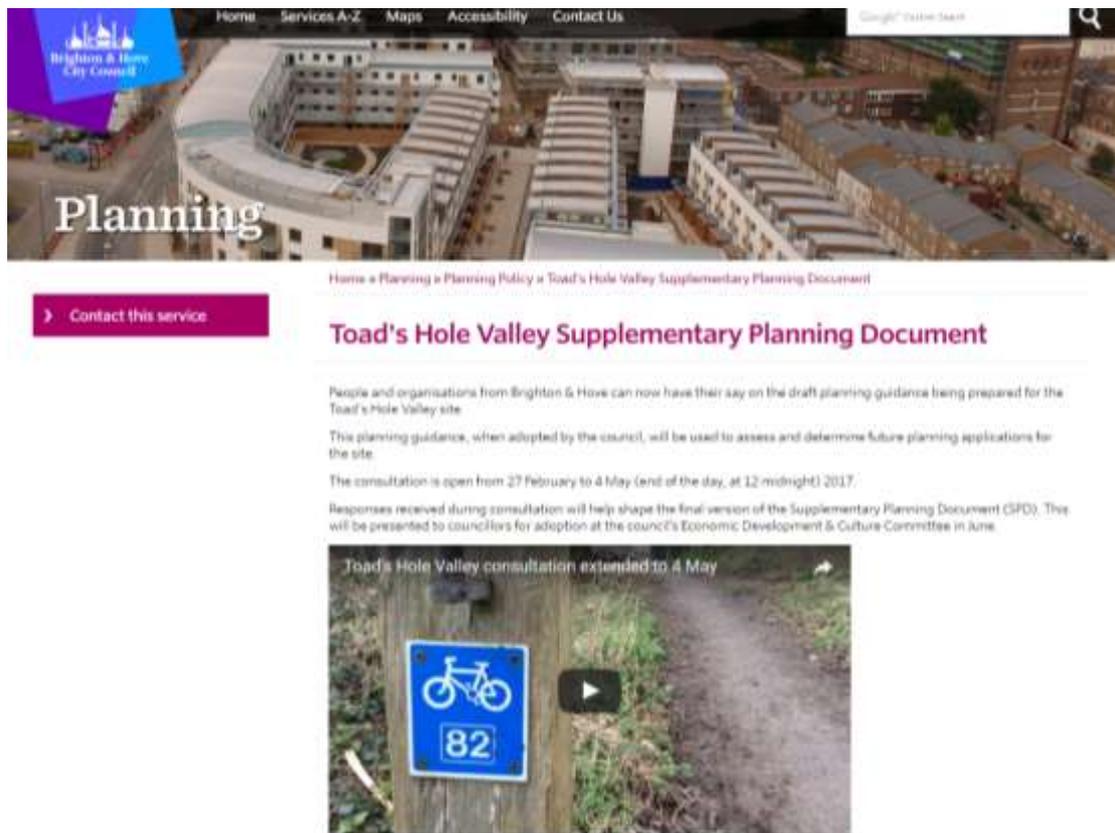
### **Other issues**

- Disappointed with technical language used in the document, that there has not been not enough consultation, that detailed design is not provided and/or policy expectations were not met via the SPD.

## **3. Methodology**

- 3.1. The consultation was undertaken between 27 February and 4 May 2017.

- 3.2. The consultation undertaken was guided by the council's adopted Statement of Community Involvement (see Appendix 1)?.
- 3.3. An invitation to comment on the draft SPD was sent via email to 219 individuals; businesses; organisations; community and amenity groups; landowners and developers of the site; elected members; council, district and South Downs National Park (SDNP) officers; and statutory planning consultees interested in the development of the Toad's Hole Valley site.
- 3.4. The consultation was promoted across the city via press release, video, the council's Twitter and Facebook social media outlets and a dedicated webpage displaying information about and the documents relevant to the consultation for viewing and/or downloading.



- 3.5. Printed copies of the draft SPD and accompanying Strategic Environmental Assessment (SEA) were made available in the Jubilee, Hove and Hangleton Libraries.
- 3.6. A staffed exhibition took place on Saturday 18 March in venues close to Toad's Hole Valley at the Hangleton Community Centre from 10am to 1pm and St. Peter's Church, West Blatchington from 1.30pm to 4.30pm. This allowed attendees to view sections of the SPD printed on panels, raise concerns and ask for clarification on aspects of the SPD with council officers to help inform their responses.



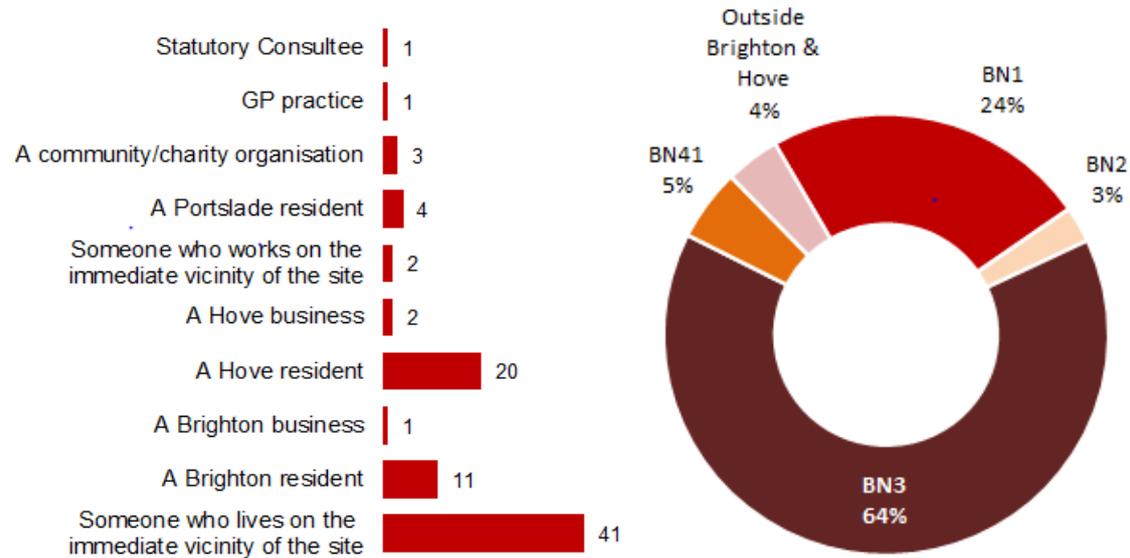
- 4.2. Of the 67 representations received via email, 25 endorsed the representation submitted by the Campaign to Save Toad's Hole Valley (see Appendix 1).
- 4.3. Representations were received from 114 individuals, 16 from organisation representatives, 7 statutory consultees and 1 landowner/developer.
- 4.4. Representations were received from representatives of the following:
- Bicycles and Cycling UK Brighton and Hove
  - Brighton & Hove Economic Partnership
  - Brighton Area Buswatch
  - Brighton Society
  - Campaign to Protect Rural England - Sussex Branch (CPRE Sussex / CPRE Sx)
  - Campaign to Save Toads Hole Valley
  - Friends of the Earth - Brighton & Hove
  - Goldstone Valley Residents Association
  - Goldstone Valley Facebook group
  - Hangleton and Knoll Project;
  - Hove Civic Society
  - Hove Park Forum
  - Landowners/Developers of western, largest section of Toad's Hole Valley site;
  - National Trust
  - Regency Society
  - South Downs Society
  - Sussex Wildlife Trust
- 4.5. Representations were received from the following statutory consultees :
- East Sussex County Council Ecologist;
  - Environment Agency
  - Highways Agency
  - Historic England
  - Natural England
  - South Downs National Park (SDNP) Authority
  - Sport England

## **5. Detailed findings**

- 5.1. For full transcript of representations please refer to Appendix 1.

## Consultation Portal

5.2. Representations received via the Consultation Portal provide information about the respondent. These are summarised below.

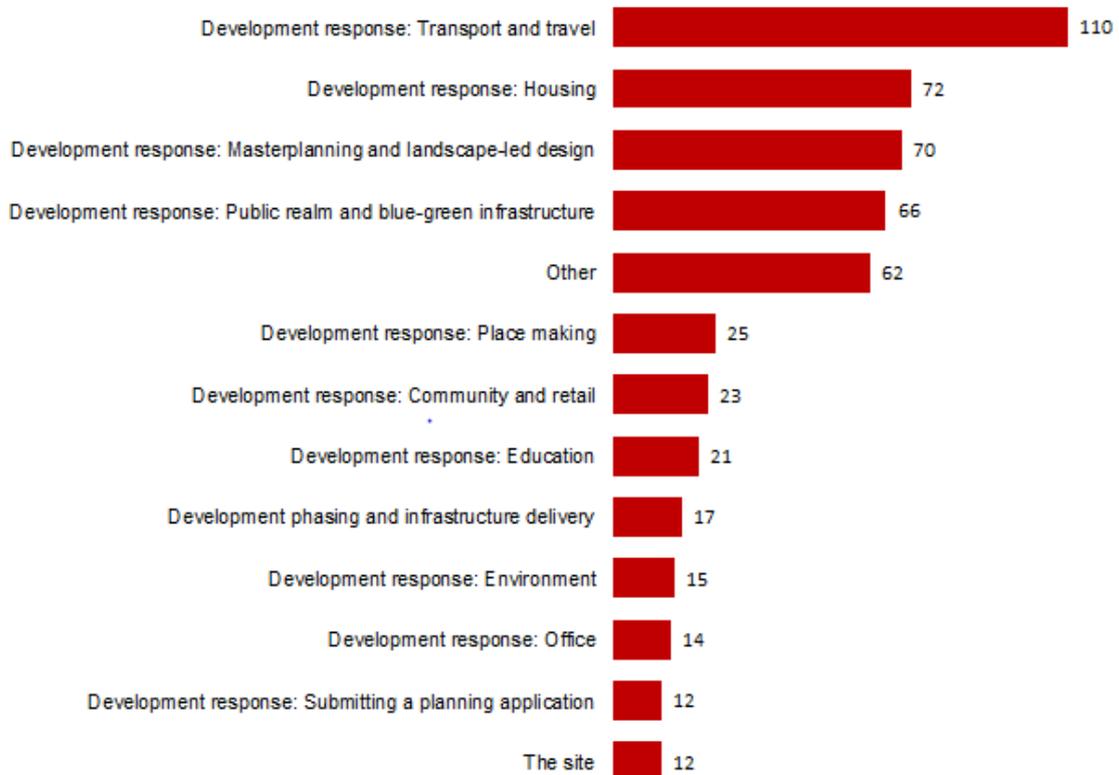


*How respondents identified themselves.*

*Respondents by post code*

## All respondents

5.3. The graph below indicates the sections of the draft SPD respondent comments were grouped under.



5.4. The table below outlines in more details the nature of the comments for each of section.

<b>Draft SPD section</b>	<b>Number of representations</b>
<b>The site</b>	
Once in a lifetime opportunity, don't waste it	11
<b>Development response: Submitting a planning application</b>	
Support for list of assessment to identify impact and mitigation measures in particular in regard to transport, landscape and archeological assessments	15
<b>Development response: Masterplanning and landscape-led design</b>	
Support for garden city / green suburb approach	33
Concerned SPD encourages higher buildings (up to 6 storeys), favouring low-rise, low-density options	20
Support for high quality, excellence architecture, building and landscape-led design	19
Sea views and/or views across the Downs/SDNP must be protected and/or additional views need to be identified and included in landscape assessment	17
Support for masterplanning and/or design code approach	10
Masterplan not appropriate	1
<b>Development response: Place making</b>	
Support for multi-function, easily accessed, safe, mixed use and/or higher-density neighbourhood centre as a focus/for all age groups	17
Neighbourhood centre not likely to happen and/or appropriate in suburban location	8
<b>Development response: Housing</b>	
Support for 40% affordable provision	44
Concerned about density/height/numbers in THV being not in keeping with surrounding neighbourhoods	26
Support for variety of housing types and pricing to include first-time buyers, houses with gardens and/or local people	19
Support for higher density and/or housing numbers including as a means of provision of better (bus) services	13
Proposed density seems too low, more housing needed in the city	1
Concerned about lack of space standards in SPD	1
Objection to 50%, 3 bed targets when other housing types are needed.	1
<b>Development response: Office</b>	
Support for modern office facilities	7
Is office accommodation really needed?	6
<b>Development response: Education</b>	
Support for school on site and/or concerned about lack of school facilities other than sixth form entry one.	18
Provide indoor sports facilities community can use too, in particular young people	4

<b>Development response: Community and retail</b>	
Support for community/SDNP facilities and/or surgery	22
Support for church and/or religious facilities on site	1
<b>Development response: Environment</b>	
Support for high standards of sustainable development in general and new energy solutions/buildign design in particular	16
<b>Development response: Transport and travel</b>	
Concerned with impact of development on quality of life, road network, air pollution and/or road safety and/or flow. Getting transport assessment and/or road design, access points and mitigation costs right is vital to reducing impact.	71
Concern with parking due to current and/or added pressure and potential for overspill into surrounding areas.	56
Road design suggestions/preferences put forward to address road safety and traffic flow including room for buses and/or cycles.	44
Support for improved, new links to SDNP, neighbouring areas and/or city centre in particular for pedestrians and cyclists.	41
Public transport improvements should be secured, ideally via SPD and as early as possible	36
Concerned about the cumulative impact of non-residential uses as traffic generators and/or parking demand and/or Court Farm development	23
New development should explore ways to use underground car parking	3
<b>Development response: Public realm and blue-green infrastructure</b>	
Support for securing SNCI restoration/long-term maintenance arrangements and/or protecting wildlife and/or delivering Biosphere objectives	44
Important appropriate amount of park area, open spaces, children play and outdoor sports facilities are provided in the right places, are safe and/or for all age groups as part of a network connecting communities in and around the development.	25
Support for introduction of trees, wildlife and/or biodiversity links across site and with SDNP and/or Three Cornered Copse and other green spaces around the site	14
Concerned about contamination of the aquifer and/or flood/drainage issues	11
<b>Development phasing and infrastructure delivery</b>	
Critical to secure timely delivery and provide adequate resources to support development in the long-term in particular with regards to maintenance	17
<b>Other</b>	
Disappointed with technical language used, not enough consultation, detailed design is not provided, and/or delivery of policy expectations.	24
Principle and/or parameters of development questioned and/or objected to	23
Broad support for SPD and/or segments of the SPD as guidance that	22

identifies opportunities for development and potentially provides greater certainty for communities and developers	
Comments regarding and/or unsuitable comparisons made with other developments in the city (NEQ, Preston Barracks, Court Farm, Churchill Square, Jubilee Square)	14
Panel exhibition attended and/or useful	5
Important to minimise disruption during construction	6
Problem with the website when responding	5
Exhibition a waste of time or not enough as a means of communicating with stakeholders	3
Co-operation of the land owner with the council and potential developers will be of paramount importance	1
SPD considered unlawful and not needed, City Plan Policies are sufficient.	1



Brighton & Hove  
City Council