

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

Toad's Hole Valley

Supplementary Planning Document

Issues & Options consultation report

September 2016

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1. About this report

- 1.1. This report summarises the findings of the early stakeholder consultation on the Toad's Hole Valley Supplementary Planning Document (SPD) conducted by Brighton & Hove City Council's Planning team.
- 1.2. The early stakeholder consultation is the first step in the preparation of this planning guidance referred to in City Plan Policy DA7 Toad's Hole Valley.
- 1.3. The aim of the consultation was to gather views from individuals who live and/work in the vicinity of the site, landowners of the site and businesses and organisations with a direct interest in the development of the site on the how a SPD could best support the successful delivery of development on this strategic greenfield site.
- 1.4. The findings of this consultation will inform the preparation of the Draft SPD that will be subject to city-wide consultation in Autumn-Winter 2016.

2. Summary of findings

- 2.1. The purpose of the consultation was to understand the type and extent of supplementary guidance that was required to support Policy DA7 in the City Plan Part One and to guide the consideration of any planning application for the site.
- 2.2. The council received 202 responses of which 140 were via the council's consultation portal; 54 via workshops and 8 email responses via email. The majority of respondents indicated that they considered a detailed SPD was required to address the Housing, Offices, Education, Community and Retail, Environment, Transport and Travel and Public Realm and Blue-Green Infrastructure issues identified in the Issues & Options paper.
- 2.3. The issues respondents were most concerned about and felt guidance would be welcomed on included:

Transport and travel

- Concern with traffic flow, noise and pollution and impact of development on already busy roads including during construction with some considering traffic calming measures and good access points would be needed to reduce impact;
- Need to improve sustainable transport links, in particular bus, cycle and pedestrian links and/or provide links and safe access from/to neighbouring communities in a challenging topography; and
- Need to provide sufficient, efficiently designed/located parking to avoid overspill into surrounding areas and/or across site.

Public realm and blue-green infrastructure

- Important to provide accessible/usable /safe network of landscaped open spaces (children play, orchard/food growing and outdoor sports facilities) and seating.

Community and retail

- Support for health, outdoor and/or shopping facilities on site. Important, however, to consider integration with other uses on site and neighbouring areas and/or potential for complementary, co-provision.

Other issues

- Masterplan/Landscape/Design plan addressing heights, layout, landscape, scale, form, siting and land use locations (co-provision).
- 2.4. The site assessment carried out by workshop participants provided an overview of the design features in the Goldstone Valley area participants liked the most and their suggestions on how to improve the features they liked the least. Their assessment provides an insight into features that could be incorporated and/or avoided in the design of the Toad's Hole Valley development. It also identifies potential partners for implementing suggested changes.
 - 2.5. The features liked the most included:
 - the green, open spaces and trees;

- the windmill and churches;
 - views of the sea and windmill; and
 - the calm, tranquil nature of the area.
- 2.6. Suggestions of what could be done to improve the public spaces in the area quickly and cheaply included:
- repairing and/or maintaining pavement and/or verges;
 - controlling parking on pavements/verges;
 - planting more trees and flowers; and
 - adding seating.
- 2.7. Suggestions of long term improvements that would have the biggest impact included:
- re-designing roads to better accommodate parking; and
 - reviewing traffic flows to better accommodate vehicle and pedestrian movement in the area.
- 2.8. Workshop participants noted that there were not many people in the area at lunchtime and evening times when the site assessment took place. This meant it was difficult for them to get the views of local users about the area. The local users that were interviewed indicated that the things they liked the most about the area were its tranquil, peaceful feel and the bus service. The things they would do to improve it included adding more seating and planting.
- 2.9. Workshop participants identified a range of potential local partners or local talent that could help implement improvements including:
- local community groups, in particular the St Peter's and St George's Church;
 - local residents, landowners, tenants and businesses;
 - the council and local councillors; and
 - Government agencies and national charities/initiatives.
- 2.10. Email responses were received from a local councillor, two residents and representatives of the landowner of the largest part of the Toad's Hole Valley site (not Court Farm), National Trust, Natural England, Regency Society and Save Toad's Hove Valley group. These highlighted, among other things, how the SPD could:
- Improve bus links and deliver safe access to site/school;
 - Support a varied mix of uses and housing types including affordable;
 - Masterplan/Design guidance on heights, location, land use, and/or materials;
 - Provide sufficient, efficiently designed parking to avoid overspill into surrounding areas;
 - Take steps to reduce impact of road noise and calm traffic flow;
 - Support for health, outdoor and/or shopping facilities on site; and
 - Protect views across open downland and/or to SNDP.

3. Methodology

- 3.1. The consultation was undertaken between 21 March and 8 May 2016.
- 3.2. It was guided by the council's adopted Statement of Community Involvement and an Issues & Options paper prepared by the council highlighting policy issues and outlining options regarding the level of guidance that might be needed for each issue (see Appendix 1).
- 3.3. Stakeholders were invited to comment on the document via:
 - the council's online Consultation Portal; and
 - dedicated workshops.
- 3.4. Some responses were also received via email and these processed as part of the consultation.

Stakeholders

- 3.5. Invitations to participate in the consultation were sent via post and email to 594 individuals and/or organisations representing different interests in the Toad's Hole Valley area.
- 3.6. These included residents and businesses living and/or operating in the immediate vicinity of the site; elected members; community and amenity groups; landowners and developers of the site; individuals/organisations who commented on City Plan Policy DA7 Toad's Hole; and council, district and South Downs National Park (SDNP) officers.

4. Responses received

- 4.1. The council received 202 responses from members of the public and representatives of organisations and groups.
- 4.2. Of these 140 (69%) responses were submitted online through the council's consultation portal; by 54 (27%) people who attended the workshops; and 8 (4%) responses were received via email.
- 4.3. Responses were received from the following stakeholder groups and their representatives:
 - East Sussex County Council Archaeologist;
 - Friends of the Earth
 - Hangleton and Knoll Project;
 - Landowners of western, largest section of Toad's Hole Valley site;
 - National Trust
 - Regency Society
 - Save Toad's Hole Valley group
 - South Downs National Park (SDNP) Authority
 - Brighton & Hove City Council's Housing Services
 - Sussex Wildlife Trust

5. Online consultation



Brighton & Hove City Council has drawn up an 'Issues and Options' paper which considers delivery of a mixed-use development on Toads Hole Valley that would provide housing, employment space and improved infrastructure to meet the future needs of the city.

Representatives of the local community, ward councillors, residents bordering the site, landowners and developers are invited to give their views on the level of guidance needed to support development. The results would form the basis of planning guidance for Toads Hole Valley to be used when considering planning applications.

 Start Survey

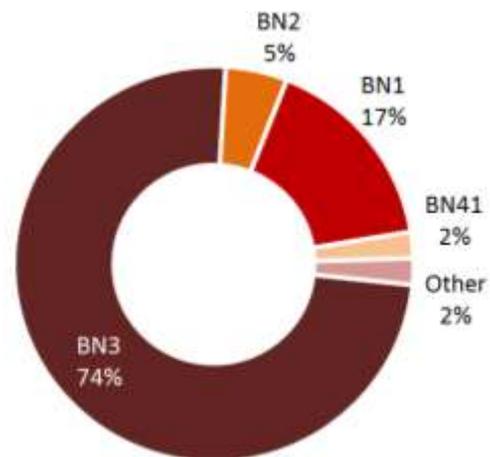
5.1. For full transcript of responses please refer to Appendix 2.

All respondents

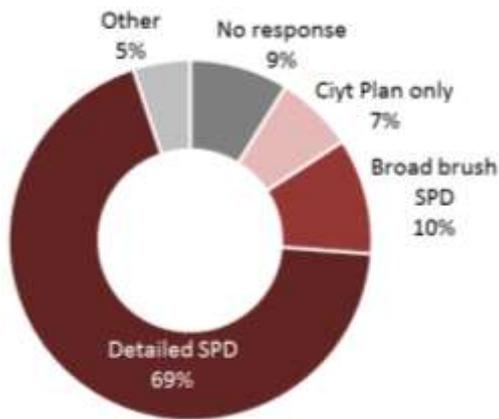
5.2. As the graphs below indicate, the majority of respondents were Hove residents (BN3 Post Code) living near the Toad's Hole Valley site.



How respondents identified themselves.



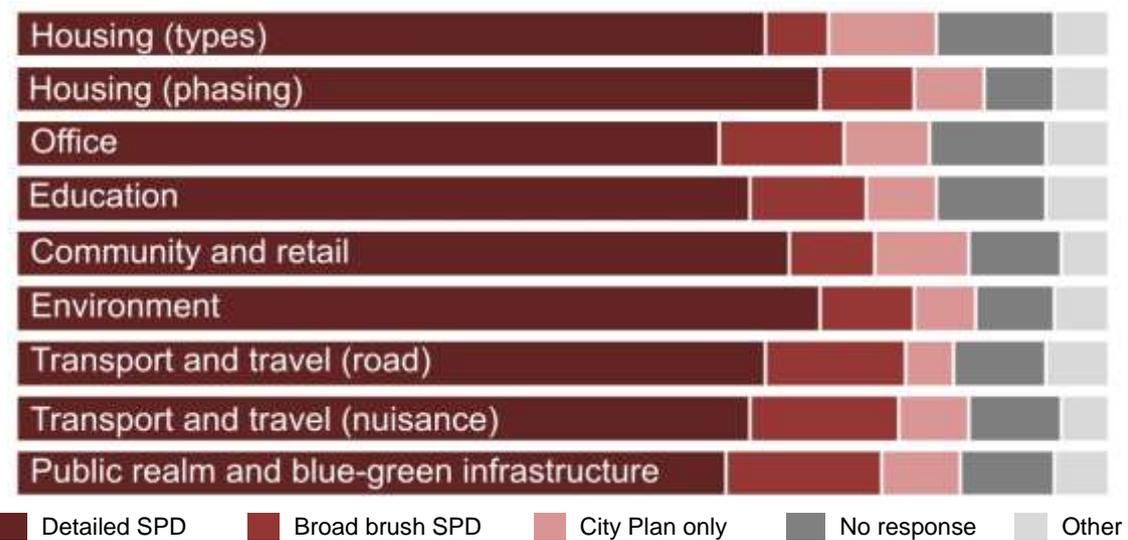
Respondents by post code



Preferred type of guidance. Average across all issues identified in Issues & Options paper.

5.3. On average, more than two thirds of respondents (79%) indicated that the key issues identified in the Issues & Options paper would be best addressed via a Detailed or Broad brush SPD.

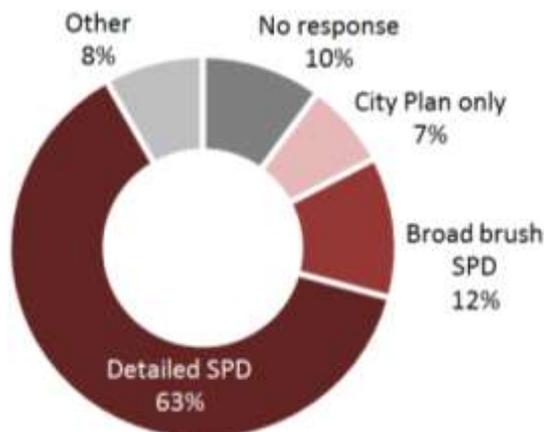
5.4. As the graph below indicates, the issues respondents felt this approach would be the more relevant include: Housing (phasing) and Environment.



Preferred type of guidance per issue identified in Issues & Options paper.

Residents living closest to the site

5.5. Of the 87 residents who identified themselves as living in the vicinity of the site, 37 (43%) were from residents with post codes within a block of the boundary of the Toad's Hole Valley site with neighbouring areas.



Preferred type of guidance, residents within one block of site boundary. Average across all issues identified in Issues & Options paper.

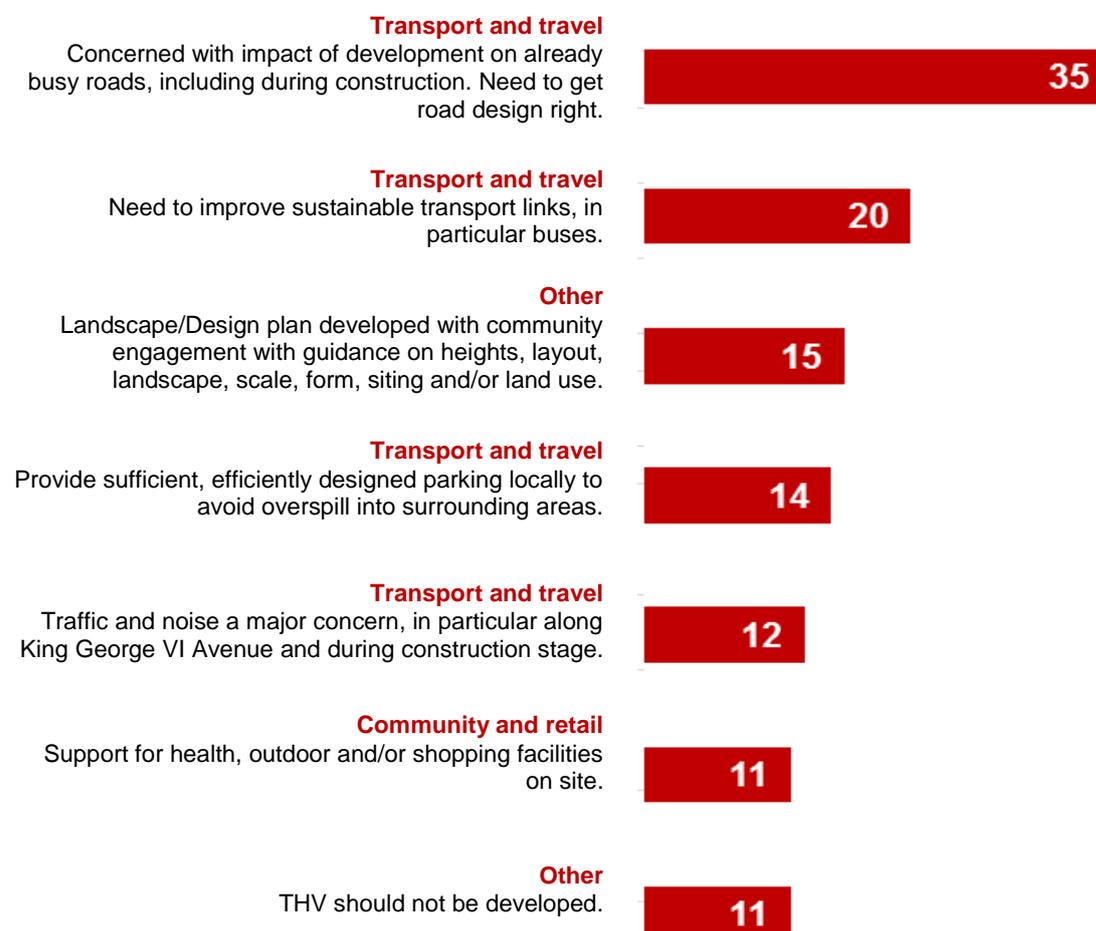
5.6. The findings among this group are consistent with that for all respondents in regard to the level of detail requested for the SPD.

5.7. In this group however, respondents felt this approach would also be the more relevant to Housing (types) and Community and retail issues.

Detailed comments

5.8. Of the 140 respondents, 67 (48%) provided more detailed comments and/or suggestions (for transcript of responses see Appendix 2).

5.9. The most popular comments/suggestions made by respondents included:



5.10. Detailed comments sent by organisations and/or officers suggested the SPD should set out the need for following supporting information to be submitted as part of a planning application:

- Environmental Impact Assessment (EIA);
- Desk-based archaeological assessment to enable an understanding of archaeological interest and inform design options; and
- Reference to the SDNP Integrated Landscape Character Assessment and production of a detailed Landscape and Visual Impact Assessment.

5.11. The SDNP Authority indicated that the International Dark-Sky Association for Reserve status granted in May 2016 requires any development outside of the National Park to show due regard for any skies of sufficient quality or sensitivity within the area. Further advice should be sought from the SDNP Authority.

6. Workshops



- 6.1. Three consultation workshops were organised to gather stakeholder views. These took place in the West Blatchington Windmill, close to the Toad's Hove Valley site, on 14 April (5.30-7.30pm), 20 April (12-2pm) and 27 April (12-2pm), 2016.
- 6.2. The first and third workshops were targeted at the general public while the second targeted council, district and SDNP officers (see Appendix 3 for list of attendees).

Workshop format

- 6.3. The workshop format was based on activities and discussions involving up to 6 participants.
- 6.4. Group activities were led by council officers who helped explain each activity and facilitate discussions.
- 6.5. All consultation workshops relied on the same format:
 - Welcome and brief introduction (10 minutes)
 - Group work 1: Toad's Hole Valley site assets (5 minutes)
 - Group work 2: Place assessment (30 minutes)
 - Group work 3: Issues & Options discussion (30 minutes)
 - Next steps and close (5 minutes)

Consultation techniques

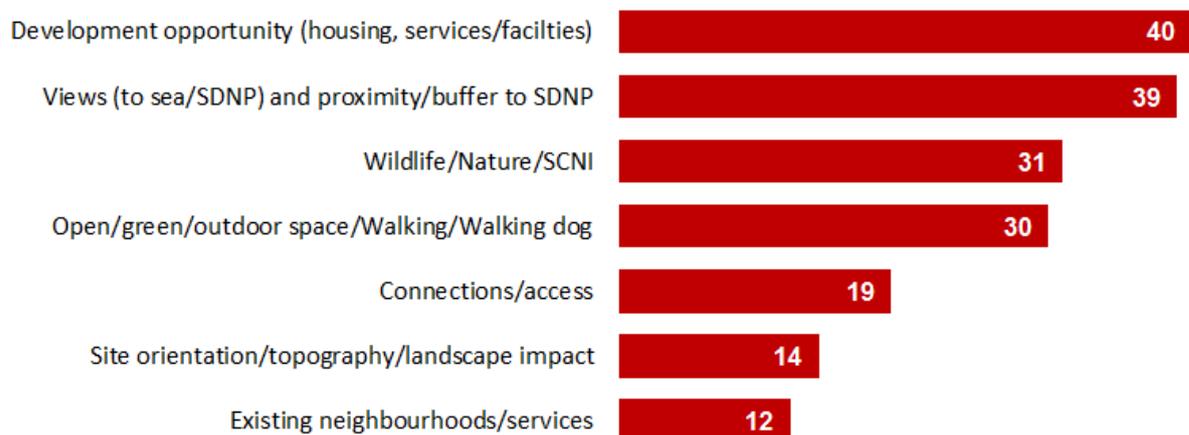
- 6.6. Group work 1 (Site assets) involved asking each participant to identify the 5 most important assets of the Toad's Hole Valley site. Participants enquiring after the meaning of 'asset' were told that the broadest possible definition of these terms applied, such as current and/or in terms of the future of the site. For full transcript of responses see Appendix 4.
- 6.7. Group work 2 (Place assessment) involved an assessment of one of six place types, representing different spatial configurations common to suburban areas surrounding the Toad's Hole Valley site such as amenity and verges, cul de sac, large traffic junction, bus route, small shop parade and residential street (see Appendices 5). Participants were handed a clipboard, escorted to one of the six sites and asked to walk around the area on their own and complete the questions in the assessment form (see Appendix 6). The form encouraged participants to

consider various issues, including, positive and negative aspects of the place, suggestions to improve the area in the short- and long-term and to interview a person in the space and ask what they liked about and how they might improve the place.

- 6.8. Group work 3 (Issues & Options discussions) involved asking each group to discuss one of the 7 themes detailed in the Issues & Options paper: Housing, Office, Education, Community and retail, Environment Transport and travel and Public realm and blue-green infrastructure. Participants were asked to consider one issue selected by the workshop organisers and then another of their group’s choice. They were asked to discuss the options within the group, write their comments and/or choice down and, if possible, reach a consensus around the group’s preferred option for each of the issues discussed. Comments on the options were recorded via “Post-it” notes, placed by participants on a large piece of paper.
- 6.9. The consultation techniques used in Group works 1 and 2 were chosen for their design focus and broad application (anyone being able to contribute, without the need for prior knowledge of urban design issues) and time effectiveness (the exercises needed to fit into a two-hour session). The technique used in Group work 3 was chosen because of its issue-focused nature.
- 6.10. All techniques have been successfully used in past planning document consultations carried out by the council. The objective was to combine a variety of techniques that would provide a broad-based data set to inform future decisions regarding the nature of the planning guidance referred to in City Plan Policy DA7 Toad’s Hole Valley.
- 6.11. Transcripts of all responses collated from participants during the workshops are registered in Appendices 7 (Place assessment) and 8 (Issues & Options). In this section, a summary of the main findings regarding each group work are provided.

Site assets exercise

6.12. This activity aimed to identify what participants say as key assets of the Toad’s Hole Valley site. As the graph below shows the most popular were:



Place assessment exercise

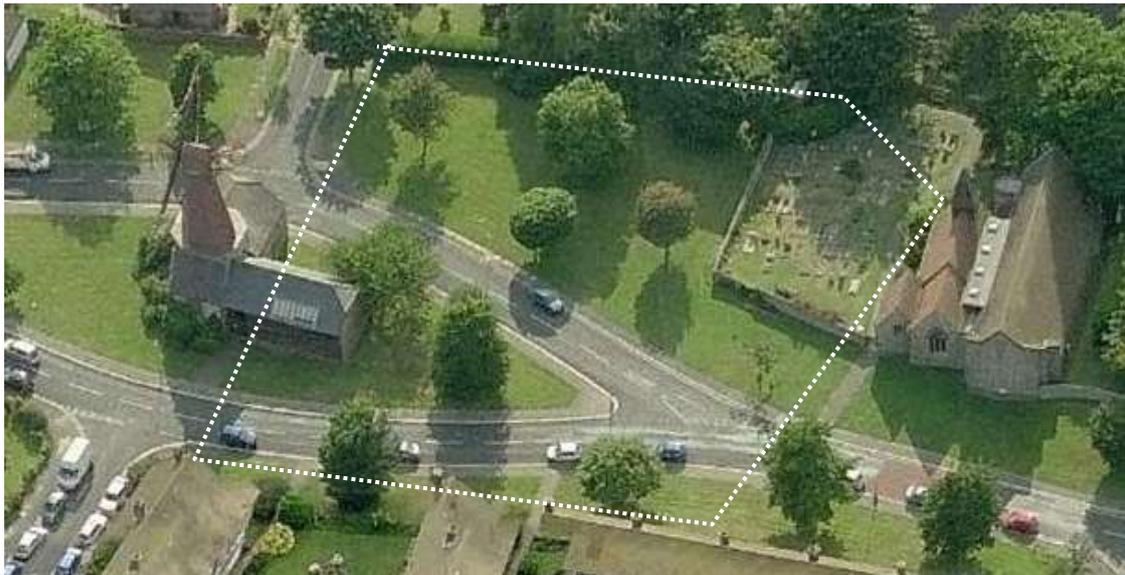
6.13. This activity involved participants being taken on site to carry out an assessment of urban features frequently found in area surrounding the Toad's Hole Valley site.

6.14. Six areas representing different spatial aspects of the urban design area were selected for participants to evaluate using the Place Game technique (see Appendices 3 for map of these areas). They were:

- Site 1 - Amenity and verges
- Site 2 - Cul de sac
- Site 3 - Major junction
- Site 4 - Bus route and community facility
- Site 5 – Small parade
- Site 6 - Residential street

6.15. It should be noted that the assessments were carried out on working days during Spring 2016 when the weather was fair, daylight hours longer and at times when pedestrian activity levels would be low. The impact this may have on factors such as perceptions of safety would need to be carefully considered.

6.16. Site 1 - Amenity and verges



‘Could be better used or extension to churchyard or with some ‘interest’ seaters to sit on and kids to play on.’

‘The open vistas are good for the listed Windmill.’

‘Remove through traffic. Make space bigger, more usable.’

Good:

- Overall attractiveness
- Feeling of safety
- Cleanliness / Quality of maintenance
- Sense of pride and ownership

Poor:

- Economic viability
 - Presence of children and seniors
-

| | |
|---|--|
| What is best about this place? | <ul style="list-style-type: none"> ▪ Trees / Green / Open space ▪ Windmill / Church / Heritage |
| Improvements that could be done right away: | <ul style="list-style-type: none"> ▪ Seating ▪ Control/Avoid parking on pavements/verges and/or widen pavements |
| Long-term changes that could have bigger impact: | <ul style="list-style-type: none"> ▪ Re-direct / Review traffic flows to make better use of open space |
| What people in the place like best about it and what they would do to improve it: | <ul style="list-style-type: none"> ▪ There was no one around to ask the question |
| Local partnerships to support improvements: | <ul style="list-style-type: none"> ▪ St Peter's / St George's Church ▪ Hangleton & Knoll and Goldstone Valley community groups ▪ West Blatchington Windmill ▪ Council's Highway team ▪ Landowners |

6.17. Site 2 – Cul de sac



‘On street parking detracts from overall amenity of close.’

‘Not possible now but would have made the road wider so cars don't need to park on grass verges and spoil them.’

‘No public seating. No views out or in.’

| | |
|-------|--|
| Good: | <ul style="list-style-type: none"> ▪ Feeling of safety ▪ Ease in walking to the place ▪ Frequency of community events/activities ▪ Overall busy-ness of area ▪ Sense of pride and ownership |
|-------|--|

| | |
|---|--|
| Poor: | <ul style="list-style-type: none"> ▪ Comfort of places to sit ▪ Clarity of information / signage ▪ Mix of stores / services ▪ Evidence of community activity |
| What is best about this place? | <ul style="list-style-type: none"> ▪ Quiet / Tranquil |
| Improvements that could be done right away: | <ul style="list-style-type: none"> ▪ Repair/Maintain pavement and/or verges |
| Long-term changes that could have bigger impact: | <ul style="list-style-type: none"> ▪ Control parking on pavements/verges ▪ Re-design road/pavements to better accommodate parking/pedestrians |
| What people in the place like best about it and what they would do to improve it: | <ul style="list-style-type: none"> ▪ Quiet / Tranquil ▪ No one to ask |
| Local partnerships to support improvements: | <ul style="list-style-type: none"> ▪ Community groups ▪ Neighbours/Residents ▪ Council ▪ Church |

6.18. Site 3 - Major junction



‘As a driver it's an easy place to negotiate. As a pedestrian it's open and unpleasant.’

‘Upgrading the road surface. Making bus stops more weather proof, perhaps with planting to link in with the other foliage. Improve footpaths where people use short cuts so they can be used in all weather.’

‘Bins, flower planting, new traffic/pedestrian lights, benches, dog poo bins.’

| | |
|---|---|
| Good: | <ul style="list-style-type: none"> ▪ Vehicular access ▪ Ease in walking to the place |
| Poor: | <ul style="list-style-type: none"> ▪ Comfort of places to sit ▪ Mix of stores / services ▪ Number of people in groups |
| What is best about this place? | <ul style="list-style-type: none"> ▪ Trees / Green/Open space |
| Improvements that could be done right away: | <ul style="list-style-type: none"> ▪ Improve access/crossing for pedestrians ▪ More planting/trees |
| Long-term changes that could have bigger impact: | <ul style="list-style-type: none"> ▪ Re-design traffic control to better accommodate flow ▪ Improve road surface (reduce noise) / footpaths / desire lines ▪ More planting / trees |
| What people in the place like best about it and what they would do to improve it: | <ul style="list-style-type: none"> ▪ Attractive, colourful |
| Local partnerships to support improvements: | <ul style="list-style-type: none"> ▪ Church ▪ Neighbourhood/Resident groups ▪ Pre-school/School parents/pupils ▪ Sustrans / Sussex Wildlife Trust ▪ Local businesses/shops |

6.19. Site 4 - Bus route and facility



‘Particularly difficult to walk as cars are parked all over the pavement.’

‘Disabled driver has brought disabled friend for an appointment. She values parking and would like more for her mobility car.’

‘Improve pavements - hotchpotch of materials at moment. Stop cars parking on pavements.’

| | |
|---|--|
| Good: | <ul style="list-style-type: none"> ▪ Vehicular access |
| Poor: | <ul style="list-style-type: none"> ▪ Overall attractiveness ▪ Comfort of places to sit ▪ Mix of stores / services ▪ Number of people in groups |
| What is best about this place? | <ul style="list-style-type: none"> ▪ Church ▪ Cleanliness ▪ Bus service |
| Improvements that could be done right away: | <ul style="list-style-type: none"> ▪ Planting/Maintenance verges ▪ Control parking on pavements/verges ▪ Bus shelter/Add 'real time' bus information. |
| Long-term changes that could have bigger impact: | <ul style="list-style-type: none"> ▪ Redevelop church and garage sites. ▪ Re-design traffic control to better accommodate flow |
| What people in the place like best about it and what they would do to improve it: | <ul style="list-style-type: none"> ▪ No one to speak to ▪ Bus service |
| Local partnerships to support improvements: | <ul style="list-style-type: none"> ▪ Landowners / Tenants ▪ Community groups ▪ Councillors ▪ Church |

6.20. Site 5 - Small parade



‘Good shop. Nice trees on the green.’

‘More landscaping. More pedestrianisation (i.e. fewer cars would improve quality of space). More trees or flower decoration.’

‘Improve appearance of shop. Improve green space. Community notice board. Keep it clean.’

| | |
|-------|--|
| Good: | <ul style="list-style-type: none"> ▪ Vehicular access |
| Poor: | <ul style="list-style-type: none"> ▪ Comfort of places to sit ▪ Mix of stores / services ▪ Economic viability |

| | |
|---|---|
| What is best about this place? | <ul style="list-style-type: none"> ▪ Trees / Green/Open space |
| Improvements that could be done right away: | <ul style="list-style-type: none"> ▪ More planting/trees ▪ Remove street clutter/Collect rubbish |
| Long-term changes that could have bigger impact: | <ul style="list-style-type: none"> ▪ Shared surface ▪ Add seating ▪ Pedestrian crossing ▪ More planting / trees ▪ Local employment ▪ Community facilities |
| What people in the place like best about it and what they would do to improve it: | <ul style="list-style-type: none"> ▪ Good amenities/shop ▪ Don't like anything ▪ Remove phone box ▪ More planting/landscaping |
| Local partnerships to support improvements: | <ul style="list-style-type: none"> ▪ Highway Authority ▪ Council ▪ Community groups ▪ Local artists |

6.21. Site 6 – Residential street



‘Quiet residential area. Pleasant. Busy at pick-up time, would like traffic to be less on or parking at church time. Parking is an issue. Space between houses too narrow for modern cars.’

‘Potential for shared space approach to slow traffic and encouraging on-street parking in particular zones.’

| | |
|-------|---|
| Good: | <ul style="list-style-type: none"> ▪ Overall attractiveness ▪ Feeling of safety ▪ Ease in walking to the place |
| Poor: | <ul style="list-style-type: none"> ▪ Mix of stores / services ▪ Overall busy-ness of area ▪ Frequency of community events/activities |

| | |
|---|--|
| What is best about this place? | <ul style="list-style-type: none"> ▪ Attractive, familiar, pleasant, safe ▪ Trees / Green/Open space |
| Improvements that could be done right away: | <ul style="list-style-type: none"> ▪ Planting/Maintenance verges/pavements ▪ Control parking on pavements/verges |
| Long-term changes that could have bigger impact: | <ul style="list-style-type: none"> ▪ Redesign road to better accommodate parking/slow vehicles down. ▪ Maintain pavements/shared drives |
| What people in the place like best about it and what they would do to improve it: | <ul style="list-style-type: none"> ▪ Quiet/Peaceful area ▪ Control parking on pavements/verges ▪ Redesign road to better accommodate parking/slow vehicles down ▪ No one to speak to |
| Local partnerships to support improvements: | <ul style="list-style-type: none"> ▪ Local residents ▪ Council ▪ Community groups ▪ Biosphere project/initiatives ▪ National Government/initiatives |

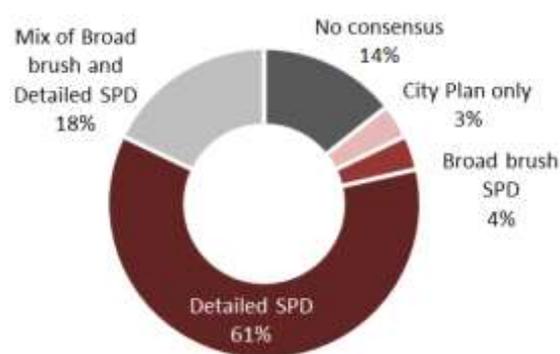
Issues & Options discussion

‘Concerned about ‘real affordability’ of homes, potential impact on starter homes and long-term affordability needs.’

‘Opportunities for local employment. Independent/local; nursing homes/nurses; apprenticeships - how can we encourage this? How can young people benefit.’

‘Mix of units + unit types to form a community.’

‘Green corridors: routes people would use.’



7.1 On each of the discussion tables, participants were asked whether a consensus could be reached on a preferred option.

7.2 As the graph on the left indicates, the majority of discussion groups showed preference for a Detailed SPD and/or a mix of Detailed and Broad bush SDP.

6.22. Comments most frequently made on the discussion tables across issues identified in the Issues & Options paper included:

| | |
|---|----|
| Transport and travel Need to improve sustainable transport links, in particular buses/bicycles and/or provide safe links to neighbouring communities and SDNP in challenging site topography. | 42 |
| Transport and travel Concern with traffic flow, noise and pollution. Traffic calming measures and good access points needed. | 23 |
| Other Masterplan/Landscape/Design plan addressing heights, layout, landscape, scale, form, siting and land use locations (co-provision). | 22 |
| Public realm and blue-green infrastructure Important to provide accessible/usable /safe network of landscaped open spaces (children play, orchard/food growing and outdoor sports facilities). Provide seating. | 20 |
| Community and retail Support for range of community and retail facilities on site. Important to consider integration with other uses on site and neighbouring areas and/or potential for co-provision. | 16 |
| Transport and travel Concerned with impact of development on already busy roads, including during construction. Getting road design right is vital. | 15 |
| Environment Important high standards of design and sustainability are achieved. | 13 |
| Transport and travel Provide sufficient, efficiently designed/located parking to avoid overspill into surrounding areas and/or across site (allow for electric charging points). | 13 |

7. Email responses

7.1. The council received 8 email responses via email from: one local councillor, two residents and representatives for:

- Regency Society
- Save Toads Hole Valley group
- The National Trust
- Enplan on behalf of Toad's Hole Valley landowners (western and largest section of the site); and
- Natural England.

- 7.2. Enplan expressed concern that SDP would add financial burden to landowner/developer and outlined the reasons for their preference for the City Plan Only option.
- 7.3. The Save Toads Hole Valley group and the National Trust expressed their support for the Detailed SPD option and outlined the reasons and instances where further guidance could assist the delivery of development on the site.
- 7.4. Natural England made no comments at this stage.
- 7.5. The reminder respondents did not express a clear preference for any of the options specified in the Issues & Options document.
- 7.6. Comments and/or suggestions most frequently made across all respondents included:

| | |
|---|---|
| Improve bus links and deliver safe access to site/school. | 5 |
| Support for varied mix of uses and housing types including affordable. | 3 |
| Masterplan/Design guidance on heights, location, land use, and/or materials. | |
| Provide sufficient, efficiently designed parking to avoid overspill into surrounding areas. | |
| Take steps to reduce impact of road noise and calm traffic flow. | |
| Support for health, outdoor and/or shopping facilities on site. | |
| Protect views across open downland and/or to SDNP. | 1 |
| Prioritise green infrastructure, Biosphere principles and design features to enhance biodiversity/wildlife. | |
| Need for appropriate links to SDNP and/or SNCI. | |
| Support for secondary school on site. | |
| Support for low-density housing. | |
| Consider need for primary school. | |
| Open spaces, children play and recreation facilities should be provided. | |
| Local communities should have access to school facilities in the evenings/holidays. | |
| Support for greater share of family housing | |
| No buildings/housing along King George VI Avenue | |
| Concerned with impact of development on already busy roads, including during construction. | |
| Document should not be jargon-laced or difficult to read. | |
| More and/or high-density housing. | |
| Development needs to fit in with adjacent suburbs/areas. | 1 |

Development that adheres to Garden Suburb principles.
Workshop activities not useful. Not enough thought has gone
into it.
Offices needed and creative hub welcomed.
High standards of design and sustainability should be achieved.
Concern with increased risk of flooding and water run-off.
Secure SNCI restoration and protection during construction and
long-term maintenance of SNCI and open spaces
Detailed EIA and/or Landscape assessment that ensures
adequate mitigation.
Area not adequate for traveller accommodation
Re-route King George VI Ave as proposed by developer in
Vision document
Support for low-rise



Brighton & Hove
City Council