

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

Toad's Hole Valley

Supplementary Planning Document

Draft SPD consultation report

APPENDICES

May 2017



Brighton & Hove
City Council

Contents

1. Full transcript of responses received via email and by hand	
1.1 Statutory consultees	1
1.2 Landowners/Developers	6
1.3 Organisations/ Groups	13
1.4 Individuals	30
1.5 Individuals who supported Campaign to Save Toad's Hole Valley representation	36
2. Full transcript of responses received via the council's Consultation Portal	
2.1 Statutory consultees	38
2.2 Organisations/Groups	38
2.3 Individuals	44

1. Full transcript of responses received via email and by hand

1.1 Statutory consultees

Hannah Hyland on behalf of the **Environment Agency**

The site falls within groundwater Source Protection Zones 1 and 2 for the Goldstone abstraction. The site is also within a Groundwater Safeguard Zone and the chalk beneath the site is designated as a Principal Aquifer. Therefore the groundwater beneath this site is very sensitive to pollution and needs to be protected. We are pleased to see that the SPD and associated SEA recognise these sensitivities and the requirements set out in section 4.49 would ensure that any development on the site would need to protect the groundwater from contamination. We also support the requirements for wider environmental benefits on the site including the use of water efficiency measures.

David Bowie on behalf of the **Highways Agency**

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England are the highway authority responsible for the A27 Trunk Road in the Brighton and Hove District as it forms part of the national Strategic Road Network.

Highways England's interest in Policy Documents relates to how Local Authorities deal with the traffic and transport impacts of development. Specifically, policy to reduce travel demand by car and promote and encourage travel by public transport and other more sustainable modes of travel (walking, cycling). In relation to the draft SPD for Toad Hole Valley, we are pleased to see that appropriate consideration has been made in this regard and reference is made to the appropriate policy and strategy in the councils City Plan 1 (Policy DA7) and the Local Transport Plan 4. Highways England are satisfied that the SPD gives sufficient guidance in this regard. However, whilst the SPD deals with the general matters relating to Transport issues this only covers matters which relate to the site internally and the local road network. It would be useful to re-iterate within the document that even after provision and promotion of sustainable transport there are likely to be residual impacts on the A27 Devil's Dyke junction and that the expectation is that

improvements will be brought forward as part of the development proposals and that such improvements will require entering into a s278 agreement with Highways England. It is appreciated that this is already briefly outlined in City Plan 1 DA7 (q) to which the SPD refers but this should be elaborated upon.

In relation to the possibility of a pedestrian/cycle link from the site under the A27 to connect into the National Park, Highways England would require that two lanes in both directions on the A27 will need to be maintained at all times. Depending upon the construction method, should such a proposal proceed, this requirement could have significant cost implications and therefore it would be preferable to include this within the SPD. Policy in relation to noise attenuation barriers would preclude these from being provided within the A27 highway boundary and therefore such measures will need to be provided well within the site boundary away from the A27 alignment.

Martin Small on behalf of **Historic England**

Thank you for your e-mail of 28th February advising Historic England of the consultation on the draft Toad's Hole Valley SPD and accompanying SEA. We are pleased to make the following comments.

Draft SPD

According to our records there are no designated heritage assets on or in close proximity to Toad's Hole Valley. However, we note that the SEA states "*The site has been identified as having potential for undesignated buried archaeological remains*" as one of the sustainability issues, and that the Table of Issues and Options in the SEA states "*Area is rich in prehistoric and Roman remains*".

To address the non-designated archaeological remains (which could be demonstrably of equivalent significance to scheduled monuments) the SEA recommends that the "*SPD should ensure that any undesignated heritage assets are assessed prior to any development work**" and that "*an archaeological desk based assessment is required to inform approach*". (These recommendations appear to be in response to our comments on the SEA Scoping Report).

The SEA then goes on to say that "*Policy DA7 and other City Plan Policies provide sufficient guidance*". However, Policy DA7 makes no reference to any archaeological desk-based assessment being required (nor does Policy CP15 or any other policy in the City Plan Part One).

Paragraph 4.6 of the SPD refers to an archaeological assessment in an indicative list of information required. However, given the recommendations of the SEA and the lack of any specific requirement for an archaeological assessment in Policy DA7 (or any other policy in the City Plan Part One), we consider that the SPD should be explicit and firm that such an assessment is required at an early stage to inform the nature and layout of any development at Toad's Hole Valley.

Sharon Jenkins on behalf of **Natural England**

Thank you for your consultation on the above, dated and received on 3rd April 2017 by Natural England.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

Strategic Environmental Assessment/Habitats Regulations Assessment

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic

Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

4.14. Strategic Views. Strategic views both in from and out to the SDNP extend far beyond the three shown. The site is highly visible from the wider expanses of the Park including the South Downs Way National trail, the Monarchs Way and other public rights of way. We would expect this to be comprehensively covered by a Landscape and Visual Impact Assessment.

Roy Little and Vicky Lawrence on behalf of the South Downs National Park

Further to my previous email, please find below and attached the SDNPA's comments on the draft SPD regarding Toads Hole Valley. It is considered that on the whole, the SPD communicates a lot of the issues on site really well. As discussed at our meeting last month, I have included the majority of the comments in a ... Word document. There were, however some points that we felt would benefit from additional emphasis and clarification. These should be read alongside the comments previously provided on 23 November and 21 December 2016 (attached for ease of reference above). It is further suggested that these comments should be added to the final SPD as appendices. Most importantly, perhaps, is the order in which documents are produced and the development for the site is formed. As discussed at our meeting, the LVIA needs to come first, in order to inform and shape the vision, upon which the masterplan can be based, with design codes and the application following. This is detailed in the comments attached as well.

Noise and Topography

Topography is very striking at the site – and a significant determinant of landscape character here. The SPD does clearly reference this – but a developer willing to allow the topography to dictate this scheme (i.e. take a landscape-led approach) rather than one forming the scheme 'on plan' would be strongly encouraged. As well as landscape character, topography is also a key driver for this site with regard to the noise environment it creates. Noise was striking during the site visit and interesting - as it was not always the A27 that was dominant, more often it was King George VI Ave. The facing valley sides bounce and reflect noise, so as the SPD mentions – materials and design – and also use of vegetation to dampen noise would be sensible as it can deliver so many other benefits (SuDS, wildlife, air pollution). As a result of this it is envisaged more space for vegetation could be needed at this site than you may initially think – as a result this should form the framework for the site.

Connectivity

Making this site work in terms of circulation for both people and wildlife, within the site and ensuring it doesn't become an island. Links out will be vital to making it work – links into the SDNP are of course supported but other links too are important. For example in terms of GI or stepping stones for making the suburbs of Brighton more accessible for wildlife – the eastern corner of the site is a key point. With regard to links to the National Park, it is equally important to bring the SDNP into the development, as well as improving links out to it. The whole site should be viewed as a gateway to the Park. Officers are happy to offer support to the developer to enable this to be achieved successfully.

The SDNPA appreciates that both the bridge and tunnel idea (as new links between the SDNP and the site) are not straightforward as a result of topography, but all opportunities for connectivity (people and wildlife) should be thoroughly investigated and encouraged through the SPD.

Visibility

Within, into and from the site. Some key views are included in the SPD but views out to the SDNP and views between the two valley sides are also really critical. These visual issues can't all be solved by planting trees – so design will be crucial. Links to Dark Night Skies.

It is considered that the word 'buffer' for landscaping proposed should be avoided in the SPD as ideally it will have many important functions to play within the scheme. Buffers are not a panacea to landscape or visual impacts but they are often treated as one, having a buffer doesn't negate the need to design a great scheme!

There are clear and obvious opportunities that arise from the development of this site, for example, the SNCI is neglected and full of litter so there's opportunity to provide some access following existing routes and improving the site's management and ownership to make it a positive experience for people using it. The existing constraints on and around the site mean it will likely be a challenge to achieve a good scheme here and this may need to be emphasised over and over to potential developers as it needs someone dedicated to making it work and the SDNPA would be happy to help offer support and guidance where it is within its remit to do so.

[With regards to 'submitting a planning application, i]t would be helpful to set out the anticipated process within the SPD so everyone is clear of the order of play. We discussed this at the meeting, but I think the order SDNPA would like to see is:

- 1) Landscape & Visual Assessment – to inform layout design, mitigation and opportunities. This should consider the site and its wider landscape context – both to inform circulation and GI.
- 2) Masterplan & Vision
- 3) Design Code
- 4) ...

Maybe this could be a flow diagram?

[Landscape assessments] should be demonstrably used to inform the iterative design process – showing how landscape and visual impacts have been mitigated through the layout and design process.

[Strategic views] should include key views towards the site from the Downs. E.g. Devil's Dyke – ref Vierwshed Study

[Links with the SDNP] or green bridge – it would be helpful to encourage potential new developers to take an integrated approach and consider how they can best deliver multiple benefits. So a bridge/tunnel to enable movement for people and wildlife for example. Could it be designed to help mitigate the effects of air pollution at the same time.

[In the Pollution and emissions section] bunds can create landscape impacts – unless very carefully designed – which uses a lot of space so as to not get a steep unnatural gradient. Thick appropriate vegetation should help to minimise noise. Again these features should be multi-functional – can the noise/pollution vegetation be linked to the SNCI and be characteristic so as to benefit wildlife. Green walls on buildings facing the road?

Suggest [in paragraph 4.64, fifth bullet] should read... through appropriate 'management and habitat creation' instead of landscaping and planting.

Transcript of SDNP representation submitted as part of the Issues & Options stage consultation

1. We would expect the Vision to make reference to being connected to the National Park – in fact, being adjacent to this designated National Park would serve as a key driver for the vision, especially as this was identified at the stakeholder stage of consultation, and is in the key development principles. It is less of a constraint and more of an opportunity. Utilising immediate access to green open space of a National Park, its ecosystem services and resources such as local materials, wood fuel etc. would alone, enhance health and wellbeing, the local economy and the lives of the new and existing communities. A development on this site should be outward looking as well as connected to existing built form and act as a valve to inject and draw-in its exceptional natural environment into the urban area – hence the suggestion of a grade separated connection over or under the A27 to the National Park.

2. In order for a Masterplan design/layout of the site to be informed by the landscape context, and integrate purposefully with the South Downs National Park, detailed landscape sensitivity analysis should be part of the new evidence base for the SPD. Landscape Sensitivity Assessment should firstly inform the allocation document/masterplan. Suggest that ZTV analysis is used as a foundation for visual impact analysis. Landscape and visual impact assessment would then be used to evaluate the impacts of any masterplan. .

3. This would provide a solid foundation and master planning framework at this stage as a good starting point. Only once a masterplan has been worked up by the applicant can a Landscape and Visual Impact Assessment test it, and this would be very late in the design process to consider potential impacts on the SDNP and site sensitivity issues.

4. 2.10 and 'Submitting a planning application'. Detailed planning applications should also provide detailed evidence/analysis of the site along with the masterplan. It will be important for sections to be included in the material to understand how the masterplan works with the topography. In addition axonometric and key views of the masterplan to comprehend how the scheme will sit in its landscape context. When consulted, stakeholders/ communities will have a better understanding of the scheme and the design rationale behind the masterplan if these elements are a required and submitted.

5. Need for a design process which is based on 3D analysis of slopes, routes and landform in order to fully understand how the site would be perceived from the SDNP and also how accessible areas of the site will be to walking and cycling. Suggest sections and 3D modelling is mandated

6. Incorrect reference to the SDNP in point 3.1 as part of the Sussex Downs AONB - the AONB

designation was revoked when the SDNP was designated (March 2010) and no longer exists. The SDNP covers the area of the Sussex Downs AONB.

3.1 The scale, form, height and siting of any proposed development of the THV site would need to be assessed in terms of its impact upon the setting of South Downs National Park (SDNP). In particular in regard to its designation as part of the Sussex Downs Area of Outstanding Natural Beauty and the South Downs International Dark-Sky Reserve. The SDNP Integrated Landscape Character Assessment and strategic views identified in section 6 of this Draft SPD should be used to guide inform impact assessments. More details about these designations are provided in Appendix 4.

7. The buffer strip outlined below in point 4.13 does not appear to be based on any study or analysis as far as could be ascertained. 'Buffer' planting should fulfil a range of functions & should be carefully planned to reduce the impact of the A27 on residents and also to reduce impact on the SDNP. This may be difficult to achieve if only the lower slopes along the A27 are planted. The lower slopes are important of course owing to their proximity to the road but it is the valley topography which would create views to more elevated sections of the proposed developments. This is where structured street tree planting within the built form will be essential to landscape mitigation measures. Also, it may be that more than 80m is needed, or less, but that other areas are also required. Therefore, the buffer zone principle needs to be further developed for the entire development proposal.

4.13 To ensure an appropriate transition between the city's urban fringe and the protected landscape, the SDNP has advised that a buffer strip of approximately 80 meters be established between the built development of THV and the A27. Further discussions with the SDNPA can help to clarify and provide advice on this buffer and other issues.

8. The Local Plan part 1 included Policy DA7 which set out the allocation proposals for THV. point 3.84 below this is strongly supported but appears weakened in the SPD;

It is not clear in the SPD how these links would be created - it is suggested that this aspect should be further developed to provide clarity and explore appropriate linking options for pedestrians and cyclists. The existing bridge over the A27 to the south is a long way from the site and should be assessed for accessibility in terms of distance and slope. Is it suitable for cycling and does it need upgrading? Is there an opportunity to construct a tunnel under the A27 within the site? It is suggested that the SPD should specify opportunities to deliver the DA7 policy requirement.

9. Recommend Use of the topography for (extreme) Natural play opportunities.

10. Although some of the above information is contained in the draft SPD in text form, it should be set out in spatial terms in a series of diagrams/maps.

Taking into account the above, the SDNPA would also draw attention of Brighton and Hove City Council, as a relevant authority, to the Duty of Regard, as set out in the DEFRA guidance note at: <http://archive.defra.gov.uk/rural/documents/protected/npaonb-duties-guide.pdf> It may also be helpful to consider the SPD/development proposals in the context of National Park Circular 2010 for guidance on these issues

at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf

Kate Cole, Ecologist (East Sussex County Council)

In line with Defra guidance on Local Sites, Sites of Nature Conservation Importance (SNCIs) are now referred to as Local Wildlife Sites (LWS). The document should be amended accordingly. Brighton & Hove's LWSs were reviewed in 2013, a process that is currently being ratified against Sussex wide selection criteria so that a comprehensive list of LWSs can be included in the City Plan Part Two. The review includes some minor boundary changes to the LWS, primarily to rectify anomalies in the original mapping process. The revised boundary, available from the Sussex Biodiversity Record Centre, should be used in the SPD.

Paragraph 2.3 of the draft SPD states that the LWS should be assessed for its recreational use; such use should be minimal and limited to footpaths and potentially school trips. It is recommended that wording within this paragraph is amended to state that the LWS has been subject to little management recently and as a consequence is becoming dominated by scrub. However, remnants of the original interest features remain and the site has the potential for restoration and enhancement through sensitive management.

Paragraph 4.3 refers to a design code which should be adhered to. It is recommended that such a code includes the need for a sensitive lighting scheme to reduce light pollution and to maintain dark areas, particularly in and around important wildlife areas and green spaces. Design should

also ensure wildlife connectivity throughout the site, with all plot boundaries being permeable to wildlife.

Paragraph 4.6 refers to the information needed to inform an application. It is recommended that the term “ecological surveys” is amended to “Ecological Impact Assessment” which should be carried out in accordance with British Standards (BS42020:2013 Biodiversity – Code of practice for planning and development) and CIEEM guidance. Ecological impacts should be assessed and recommendations for appropriate mitigation, compensation and enhancement made. The survey and assessment should consider the proposed development and the surrounding area, and should include a data search from the Sussex Biodiversity Record Centre. In line with the NERC Act and the NPPF, it should consider the existing nature conservation resource of the site, identify impacts and assess the need for avoidance, compensation and new benefits for biodiversity, including the potential to create and/or strengthen connectivity between existing habitats. The cumulative and in combination effects of this development with other local developments/plans/projects should be considered.

It is recommended that an Ecological Constraints and Opportunities Plan (ECOP) is produced to help inform the overall design process and to help gain the best outcomes for biodiversity. Further information on ECOPs is available in BS42020:2013.

It should be recognised that the LWS may not be suitable to act as a receptor site for the translocation of species from the developable area should one be needed. Alternatives may need to be sought.

Potential impacts of the development include shading and increased disturbance and predation. A buffer zone of semi-natural habitat should be maintained between the development and the LWS. The size of the buffer zone will depend on the height of the buildings proposed (and thus the degree of shading) and the wildlife interest to be protected (e.g. reptiles or birds which may be sensitive to predation). This buffer zone could serve additional functions, for example it could form part of the SuDS.

Paragraph 4.25: the conservation and enhancement of nature should be added as one of the Biosphere objectives.

Paragraph 4.56 refers to the design of the network or paths, roads and public transport. Whilst the promotion of sustainable transport is welcomed, any paths through the LWS should have as small a footprint as possible and the LWS should remain unlit.

Paragraph 4.64: materials should be locally sourced wherever possible to help boost the local economy and to reduce the carbon footprint.

Paragraph 4.65 refers to the LWS (SNCI) and other large open spaces. The conservation and enhancement of the wildlife of the LWS should be paramount and as such, any plans for linkages and improved access must be sensitive to the needs of the LWS. Early on in the design process, a management plan for the LWS should be developed, with resources secured for its implementation and review in perpetuity, and proposals for access to and use of the LWS should be developed in the light of the LWS’s conservation objectives.

The provision of 50% of houses being 3+ bedrooms? I think that’s far too high – especially with the student population and the younger generation who will not be able to afford these properties. Meaning from the start, just 50% of the proposed housing will be within a reasonable price range. I’m disappointed that there have been no access arrangements.

1.2 Landowners/Developers

Enplan on behalf of the landowners of the Toads Hole Valley site (excluding Court Farm)

These representations are submitted on behalf of Toads Hole Valley Limited, Pecla Investments Limited and Robert Mark Simon. They concern the Consultation Draft of the Supplementary Planning Document (SPD) for Toads Hole Valley which is allocated for development under Policy DA7 of the Brighton & Hove City Plan Part One which was adopted by the City Council on 24th March 2016.

We have made representations to the Council at each stage of the preparation of the SPD and these are listed below and are attached to this submission for ease of reference:

- 17th September 2014 concerning the initial proposal to prepare a development brief for the site.
- 16th March 2015 in respect of the Draft Scoping Report to the SPD.
- 20th March 2015 with Counsel’s Written Advice in respect of the SPD prepared by Christopher Katkowski QC and Zack Simons (dated 18th March 2015).

- 9th May 2016 in respect of the Issues and Options Early Stakeholder Consultation Supplementary Planning Document.

The previous submissions have made clear that the SPD was prescriptive, went beyond the policy requirements of the development plan and was unlawful.

We consider that Policy DA7, which is part of the development plan (adopted by the City Council on 24th March 2016) is a detailed and comprehensive policy, providing appropriate planning guidance for the delivery of the development allocation at Toads Hole Valley. The policy comprises three parts as follows:

- Section A - an overall strategy for the site's development with 9 '*local priorities*' to achieve this.
- Section B – 7 '*key land use elements*' for the site's development.
- Section C – 17 criteria against which development proposals are to be assessed.

The policy also requires compliance with all the relevant city-wide policies in the Brighton and Hove City Plan Part One.

We note that reference is made in Policy DA7 (at Section C (p) and (q)) to the provision of a '*future planning brief*'. The City Council will be aware that we have submitted representations, on behalf of the landowners, that any future planning brief (or SPD) should not extend beyond the scope of such a document, by seeking to provide further policy guidance which can only lawfully be contained within a Local Plan. Our representations of September 2014 clearly set out our concerns on this issue.

Legal Framework and current position

We sought the written advice of Counsel on the Council's approach to the SPD in March 2015 and this was submitted to the Council at that time. The key points provided in the legal advice (and which remain valid) are as follows:

- Whether a document is a SPD or a Local Plan is governed by the Town and Country Planning (Local Planning) (England) Regulations 2012.
- There are 3 categories to consider which are of potential relevance to a SPD and if a document contains statements on any of those categories it can only be progressed and subsequently adopted as a local plan.

For clarification, the relevant categories are:

- (i) The development and use of land which the local planning authority wish to encourage.
- (ii) The allocation of sites for a particular type of development or use.
- (iii) Development management and site allocation policies, which are intended to guide the determination of applications for planning permission.

In contrast to a local plan, a SPD must be restricted to statements on the following: '*Environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land which the local planning authority wish to encourage*'.

If an SPD contains one or more of the three local plan categories set out above, it cannot be an SPD. Furthermore, if policies or guidance in an SPD conflicts with adopted development plan policy it cannot be an SPD. In deciding whether there is a conflict, the key question is whether the imposition of the SPD's requirements could lead to different outcomes than would be arrived by applying the adopted development plan, for example through the determination of a planning application.

The 2015 Written Advice noted a number of references in the Council's Strategic Environmental Assessment (SEA) and its Scoping Report for the SPD which covered the categories expressly to be excluded by an SPD. Accordingly, the Advice was clear that the approach that the Council was pursuing in respect of the SPD at that time was unlawful.

Christopher Katkowski QC has reviewed these representations in draft and endorse their contents, in particular the fundamental point that the draft SPD undoubtedly steps outside the

lawful scope and remit of such a document. Accordingly, he considers that a key passage in the draft SPD is paragraph 1.10 which states; *'Once adopted, it is expected that planning applications relating to this site will follow this guidance....'* which as far as Mr Katkowski is concerned clearly demonstrates that the draft document unlawfully sets out planning policies despite being described as 'guidance'. If the Council take a different view Mr Katkowski suggests that the clearest way in which this matter could be resolved would be for paragraph 1.10 to be amended so as to delete the current text and substitute the following:

'This SPD sets out objectives the attainment of which the Council wishes to encourage but as the SPD cannot lawfully set out planning policies; planning applications will not be refused permission on the basis of inconsistency with the SPD.'

Mr Katkowski considers that if the Council truly considers that the SPD falls within the legal constraints for such a document the Council should be willing to accept this suggestion if only for the sake of clarity and to put the matter beyond argument. Alternatively, should the Council not accept the suggested wording then, in our view, this would confirm that the Council is seeking to use the SPD to add further policies which could readily hinder the proper consideration and determination of a future planning application. The document would therefore be open to challenge.

Representations

Our representations focus on those aspects of the Draft SPD which we consider cover the three categories which can only be included in a local plan.

Firstly we make a number of comments in respect of the consultation process undertaken by the Council that Enplan participated in.

For ease of reference we use the same headings of the SPD.

About this SPD

Paragraph 1.2 of the SPD states that the document *'takes into account the results of early stakeholder consultation held in April - May 2016 which indicated preference for producing a detailed SPD'* and reference is made to Appendix 2 of the SPD which sets out more information about the stakeholder's response. We have reviewed the responses made, and note that the vast majority of comments relate to objections over the principle of development of the Toads Hole Valley site. Most of the consultees did not comment on the content or detail of the SPD. Of those which did comment on the content of the SPD we note the following:

- The South Downs National Park Authority (SDNPA) suggested that the SPD should encourage the submission of a Landscape & Visual Impact Assessment (LVIA) and Travel Plan/Transport Assessment. The preparation and submission of these documents would be required to support a planning application for the site and are covered in Policy DA7.
- Sussex Wildlife Trust commented that they would like to see *'net gains in biodiversity'* and *'blue and green infrastructure into the design of the site'*. Both of these matters are covered in Policy DA7.
- East Sussex County Archaeologist commented that there should be trenching and field investigation. These matters are to be dealt with as part of the planning application submissions.
- Brighton and Hove Friends of the Earth noted that the development of the site was an opportunity to create exemplar 'sustainable living'. This matter is included in Policy DA7.
- Individual's comments rarely referred to a preference for a detailed or broad brushed SPD. However, where a preference was expressed for a detailed SPD, this was countered with other individuals making clear that this should not be necessary.

As a point of procedure, we consider that the Council promoted a preference for a detailed SPD. At the workshops, officers, in summing up, informed participants of the timescale for the production of a *'detailed SPD'*, in advance of reviewing the outcomes of the consultation exercise. Accordingly, we consider that the consultation was compromised in that the officers supported a clear preference for a detailed SPD.

At paragraph 1.3 of the SPD the Council sets out the aim of the document, namely, to provide

'guidance to ensure the successful delivery of a new neighbourhood for the city that meets the needs of the community' and provides a list of what the Council hopes the development will deliver. The list is extensive and, in our view, falls within categories (1) and (3) of statements which can only be set out in a local plan. We consider that this adds to development plan Policy DA7 in effectively stating that the development will need to include the following elements which have not previously been identified in the adopted policy:

- *'A neighbourhood centre that forms the heart and natural focus of THV'*. Whilst Policy DA7 (C) (i) refers to the *'provision of a new multi-use community facility'* and the supporting text to the policy does include scope for the provision of *'local shops and services'*, it does not refer to a neighbourhood centre. We consider that this falls into a 'category 1' statement, which effectively requires a new land use. Indeed, it is potentially contrary to City Plan Policy CP4 (Retail Provision), which states that any new centres can only be brought forward through development plan policy.
- *'Measures to overcome the existing physical severance caused by the A27 and King George VI Avenue'*. Again, whilst it is accepted that Local Plan Policy DA7 (C) (j) states that the applicant will be required *'address issues of highway safety'* on King George VI Avenue and issues of noise and other traffic impacts from the A27 and *'provide improved links to adjacent residential areas'* we consider that it is beyond the lawful scope of an SPD to require measures to deal with an existing issue which has a number of factors, many of which are unrelated to the development of the THV site. This issue is not referred to in Policy DA7.
- The SPD refers to supporting development which not only delivers what is required through Section 106 Agreements, future CIL payments but *'other funding opportunities'* to fund infrastructure. This is in conflict with paragraph 153 of the National Planning Policy Framework (the Framework) which states that SPD's should *'not be used to add unnecessary financial burdens on development'*.
- At paragraph 1.7 the purpose of the SPD is defined as *'facilitating the delivery of the policy's vision'*. We would question the degree to which an SPD can effectively facilitate a Local Plan policy, without itself being a Local Plan policy. Whilst an SPD can provide informatives and guidance, it is not a mechanism for the facilitation of development, since development cannot be assessed against an SPD for the purposes of determination (s70(2) TCPA 1990 and s38(6) PCPA 2004). We also note that paragraph 1.8 claims that whilst the SPD aims not to be *'prescriptive'* it goes on to state that it *'identifies opportunities to make the best use of the THV site by meeting, and if possible, exceeding policy requirements for the site, in particular, housing provision'*. This clearly exceeds the role of an SPD as is an example of its unlawfulness. [our emphasis]

As we have set out in some detail above, paragraph 1.10 demonstrates an expectation of the Council that the SPD is intended to guide the determination of applications for planning permission. Through the legal advice that has been sought this is the role of local plan policy not an SPD. The approach advocated in the SPD would be likely to result in a different outcome to the consideration and determination of an application when assessed simply against adopted Policy DA7.

The site

We do not have any comment to make on the site's description.

Planning policy context

We consider there is more than sufficient policy context within adopted Policy DA7 (and relevant city-wide policies) to properly assess and determine a planning application for the site.

Submitting a planning application

Paragraphs 4.2 to 4.7 refer less to the actual submission of a planning application and more the process which is expected prior to submission. We are concerned that the language included in this section also appears to be implying that the SPD will be used as planning policy against which to assess an application.

Moreover, paragraph 4.4 of the SPD refers to a masterplan being prepared in consultation with the Council in advance of submission of a planning application and that it be *'approved by the LPA'*

prior to the submission of planning/reserved matters applications'. Furthermore, the expectation for a design code to accompany the masterplan and that it also be approved by the Council prior to submission of a planning/reserved matters application is strongly resisted.

Amounts of development, master planning and landscape-led design

Paragraph 4.14 sets out strategic views which it states *'need to be considered in any impact assessment of the development upon the landscape in general'* [our emphasis]. Whilst it is agreed that an application will be supported by an Environmental Statement which will include an LVIA, we consider that a SPD is not the forum for setting the terms of such an assessment. The Scoping Report and Opinion stage of the Environmental Impact Assessment is the appropriate point at which strategic viewpoints can be discussed and agreed with the Council.

Paragraphs 4.15 and 4.16 specify parameters which *'should'* be delivered by the proposals at THV which includes building heights *'of no more than 6 storeys'*. The guidance is inflexible and inappropriate for an SPD. We consider that it would be more appropriate that decisions on building heights should be made after a full assessment of the site's constraints and opportunities which is currently being undertaken by Toad Hole Valley Ltd in order to inform the master planning of the development proposals. Without such an assessment it is premature to stipulate the heights of buildings.

We note that figure 4.5 sets out the inter-relationships and connections between the various land uses for THV. We consider that this diagram (and paragraph 4.21) is prescriptive for an SPD.

Place making

Paragraph 4.22 states that *'many of the city's outer suburbs lack a clearly defined centre and the creation of a new community and neighbourhood at THV allows for the provision of an identifiable centre to be planned from the outset'*. The following paragraphs set out further details in respect of the neighbourhood centre.

Existing adopted policy DA7 allows for the *'provision of ancillary supporting uses – shops and cafes and multi-use community building'* in Section B. However, the SPD goes much stating further that there is a *'need'* for *'more than just a shopping centre'* (paragraph 4.23).

We consider that the SPD's proposals for this *'focal point'*, sets out a vision more akin to a city or town centre rather than a facility serving some 700 homes, a school and commercial area. This level of guidance goes beyond the requirements of policy DA7 which does refer to a *'neighbourhood centre'* but *'ancillary supporting uses'*. We do not consider that this is the role of the SPD, but rather as adopted Policy DP4 confirms:

'New centres may come forward; particularly local centres in currently underprovided for areas (see SA6 Sustainable Neighbourhoods). Any change to the boundary, role or status of a centre, or a proposed new centre, will be brought forward through Development Plan Documents and not the planning application process.'

There is no scope for an SPD to bring forward a new local centre, since this is clearly the role of the development plan.

Housing

The SPD seeks to extend the scope of adopted Local Plan policy, by requiring that proposals *'should'* look to not only meet the City Plan Policies of SP1 and DA7 (those relating to housing numbers, densities and house sizes), but also to *'consider opportunities'* to accommodate a range of other housing considerations.

Paragraph 4.30 appears to require a planning application to consider issues relating to housing provision for a range of typologies; offering a choice for reduced car dependent living; optimising affordable housing provision; creating flexible living opportunities to accommodate home working; providing high standards of sustainable building design; and, adopting building designs which tackle issues including traffic noise and water conservation. Again, this is demonstration that the SPD seeks to extend the policy requirements in DA7 which are already clear.

Office

Policy DA7 requires that the site provides between 3.5 - 4.5 ha of land for B1 employment space, of which the office element is *'high tech'*, modern of a range of sizes *'to attract new businesses to the city and support growing businesses'* (paragraph 4.31). The emphasis within the Local Plan policy on the need to provide employment accommodation to meet the needs of the business market is important. It allows flexibility to respond to changing market and economic conditions as the development progresses. Such flexibility is essential to ensure development and housing delivery is maintained particularly in the light of the pressing need for housing in the city now and throughout the plan period.

Without reference to an evidence base setting out a demand or need (or even a policy requirement), the SPD indicates at paragraph 4.34 that the applicant *'should consider'* delivery of:

- *'user-centred facilities that are comfortable, energy-efficient environments to motivate and stimulate, allowing potential for zoned user environmental controls;*
- *high quality, flexible interior spaces with best-practice environmental design allowing for a 'seasonal-zoning' approach that maximises natural ventilation and light;*
- *a module-based gridded construction that allows for flexible use of interior space, future reconfiguration, and potential for extension/expansion;*
- *building entrances, service and delivery parking to maximise steeply sloping topography and capitalise on car parking needs to be met beneath the buildings in order to minimise visual impact and utilise the natural landforms;*
- *access to the best possible public transport provision by being located in or close to the neighbourhood centre or public transport stops;*
- *car parking in a manner that ensures that the roads leading to it are designed so as not to have the negative impacts associated with large numbers of vehicle movements; and*
- *Minimum Resource Use and Low Embodied Energy through the use of best practice sustainable procurement methods and A-rated sustainable & renewable materials, including OSM (Off-Site Manufacturing) and MMM (Modern Methods of Manufacture).'*

Clearly, the detail set out in the SPD, together with the statement that the applicant *'should'* consider opportunities to meet these expectations, is further evidence of the SPD providing planning policy which can only be lawfully provided in the development plan.

Education

Likewise, the extension beyond policy DA7 in relation to guidance for education provision is also a demonstration of an inappropriate use of an SPD. Paragraphs 4.37 states that there is an expectation that the school will meet the needs of training and apprentices within the employment development, as well as the leisure / sporting needs of the community.

The need to provide a high quality school environment and the education requirements should not be compromised in the ambition to achieve a higher degree of shared usage.

Again, this is a matter which extends the requirements of adopted Policy DA7.

Community and Retail

As set out above, the SPD seeks to introduce further policy in respect of the community and retail centre, beyond the legal remit of an SPD. This is demonstrated at paragraph 4.43 which states that the development *'should'* deliver a new local parade of 5-10 shops, which is not a figure set out in Policy DA7.

Moreover, the SPD attempts to move beyond the scope of any planning powers, by specifying the types of occupiers which will be favoured. Paragraph 4.43 states that *'the parade should be largely retail based and include some independent small businesses (such as newsagents, greengrocers, bakers), local services (hair dressers, café etc) and convenience store for top up and meal solutions'*. Whilst planning policy can determine the mix of A1, A2, A3, A4 and A5, planning has no powers over whether any individual occupier is an independent trader or not. However, even setting the mix of A1, A2, A3, A4 or A5 is a matter for planning policy, not an SPD, and as such, this attempt to govern the occupiers of any retail units is wholly inappropriate.

Attempts to secure the occupancy of retail units *'before construction commences'* (paragraph 4.44) is also unreasonable, unrealistic and beyond planning powers. It is a matter for the developer to judge when a development should be built in response to market conditions and needs.

Environment

The supporting text to Policy DA7 states that the THV development should be of an *'exemplar'* level in terms of sustainability credentials, this is caveated with the recognition that this is *'subject to viability and deliverability'*.

The SPD does mention this caveat at paragraph 4.47, but we consider that insufficient weight is given to the importance of viability and deliverability in this section., which refers to *'requirements'* and *'objectives'*.

In setting out *'opportunities'* to deliver Biosphere Reserve objectives, the SPD refers to *'requirements'* (paragraph 4.49). No reference is made to the importance of viability, which is an important and explicit frame of reference in the Policy DA7. As an example, the SPD sets out that a *'heat network'* will be a *'requirement'* of the development (paragraph 4.49, bullets 1 and 3), but at DA7 (C) (f) the policy states:

'Development within this area will aim to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability and deliverability.' [our emphasis]

Paragraph 4.50 states that the Council has undertaken a study (by Buro Happold) *'to explore the feasibility and viability of a heat network for the site'*. Toads Hole Valley Ltd has commissioned its own review of the Council's study (by the Rolton Group) which has found that a heat network proposal would be unviable without significant subsidy which are indeed the broad findings of the Council's own study.

We consider that the requirement of a district heat network is beyond the lawful approach of an SPD, and contrary to the advice paragraph 153 of the Framework with regard to adding unnecessary financial burdens on development.

Transport and Travel

The SPD sets a requirement for Travel Plans *'for different land uses'* at THV, which is a further requirement beyond those set by the Development Plan.

Public Realm and Blue/Green Infrastructure

SPD text promoting design considerations for the public realm and water/green space infrastructure continues as the rest of the SPD beings: It uses prescriptive language which goes beyond the planning policy, thus placing unnecessary financial burdens on the developer. We consider this contrary to NPPF and the aims of the City Plan.

SNCI and other large open spaces

Bullet 3 refers to *'the steep slope along the A27'* as being within the developable area of the site. This land is in the control of the Highways England and therefore not part of the developable area of the THV site.

Development phasing and infrastructure delivery

The wording in this section of the SPD is too prescriptive and again goes beyond the requirements of Policy DA7. Paragraph 5.3 states that the neighbourhood centre be delivered *'as early as possible'*; and *'with provision of a district heating system in the masterplan, an energy centre must be provided to serve the site at an early stage, with the layout of appropriate pipework in conjunction with each phase of development'* (paragraph 5.4).

Provision of a district heating system is not a requirement of planning if it is not a viable option. As such, we consider that attempts to require it in the SPD are outside the legal remit of an SPD. We have concerns that this *'requirement'* to provide a heating system, together with the other phasing requirements, not only risk adding unnecessary financial pressures to the development (contrary

to the Framework), but also risk the development being unable to respond to future economic conditions and the needs of the market. If it is intended that a phasing plan is to be approved with the masterplan referred to in paragraph 4.14 of the SPD, we reiterate our concerns in respect of a pre-submission approval mechanism.

Paragraph 5.6 of the SPD includes reference for the 'need' for an 'approved phasing plan'. Approval of a phasing plan would be by planning condition (or Section 106) attached to the decision notice as there is no scope to provide it in any other way.

Appendices

Section 6 of the Appendices to the SPD sets out further detailed design guidance for a 'Heat Network' on the site. Our representations have made clear our objection to an onsite heating system. To set out a 'high level design guidance' for an element of the scheme which is already shown to be unviable is unnecessary and unreasonable. In any event, it is not the role of an SPD to provide detailed design planning guidance, especially for elements which are not required by planning policy itself. As such we object to:

- The statement that 'space allowance should be made for an energy centre approximated as 500m²' (paragraph 7.4).
- Details about location and phasing set out in paragraph 7.5 and 7.6.

Sections relating to phasing, piping, heat network temperatures, solutions for town houses and the customer protection scheme are all far beyond what is required in an SPD and should be removed.

Conclusions

In summary, we consider that the detailed and comprehensive Policy DA7 and other city wide adopted development plan policies provide a robust policy framework to secure the high quality design and sustainable development of the allocated site at Toads Hole Valley. Indeed, we note that the Council approved a development of 69 flats on land at Court Farm in January 2017 (under application no. BH2015/04184) which is part of the allocated site covered by Policy DA7. This decision was made in advance of the SPD and in accordance with adopted Policy DA7.

The contents of the Draft Consultation SPD include numerous statements that if used by the Council as the framework to assess a planning application could reasonably result in a different outcome in the decision-making process. This would render the SPD in breach of the Regulations, unlawful and open to Judicial Review.

We have suggested (through Counsel) re-wording of paragraph 1.10 of the document and would urge the Council to consider this carefully. We would also urge the Council to review those parts of the SPD referred to in these representations.

Toads Hole Valley (including the Court Farm site) is a significant allocated site in delivering a number of land use elements including a minimum of 700 homes. As we explained when we met with you and Liz Hobden on 24th April, the landowners have instructed an experienced professional team are undertaking detailed site assessment work to inform the master planning and environmental statement that will accompany the planning application, programmed to be submitted by the end of this year.

In the light of this work we would hope that the Council works with the applicants to deliver the comprehensive requirements set out in Policy DA7 of the adopted City Plan Part One in order to secure a successful development.

1.3 Organisations

Andrew Boag on behalf of **Brighton Area Buswatch**

Thank you for the opportunity to comment on the Toads Hole Valley Draft Supplementary Planning Document.

Our main issue is that the development should be served by regular bus services so as to discourage car use and increasing traffic congestion. The prime road network should therefore be suitable for full size double deck buses with opportunities for bus stops and shelters at locations which minimise walking distances from new homes and shops. The new Toads Hole Valley local centre should be designed for easy bus access, not filled with the sort of large out of town stores which encourage car use.

If the development relies on an entirely new dedicated bus service, then we may be lucky to see an hourly or half hourly daytime service with no evening or Sunday buses. It is only by combining it with an established existing service, that we are likely to see a service frequent enough to encourage its use, and so avoid what is basically a car only development, worsening the area's existing congestion problems.

Possible options to achieve this are:-

- (1) Extending the 21/21A Goldstone Valley service, beyond King George VI Drive, across the flat part of King George VI Avenue (possibly using a bus gate and traffic signals), then down into (and through) the new development, with a suitable turnaround point at the western end of the development. This could facilitate a substantial increase in frequency of the Goldstone Valley service (currently every 30 minutes) benefitting a much wider area, together with the reintroduction of a regular evening service (withdrawn in November 2015). The 21/21A has the added advantage of providing direct access to Hove rail Station as well as Hove Town Centre and central Brighton.
- (2) A more radical alternative could be to run a single lane (bi-directional) bus only road from around Poynings Drive, down the open slope, into the new development, with a suitable turnaround point at the east side of the development. This would allow the service 5B to be extended beyond Hardwick Road to give the new development an attractive 10-minute service (with a 15/20 minute evening/Sunday service), greatly encouraging bus use.

Without linking other services, the proposed new development could suffer from infrequent services especially after any development support runs out. Obviously these proposals will need co-operation of the main bus company.

We note some older developments in the City which have not benefitted from good bus services due to their design. Meadowview is let down by the lack of a bus link between the Coombe Road area and Bevendean. Given the housing density, linking both together may have justified a 10-minute daytime service, serving both areas. As it is, Bevendean just gets a 15/20 minute daytime service, Meadowview relies on a partly subsidised service to provide basically a half-hourly service; with the threat of no evening service at all when Council funding expires next year. Please try to ensure these problems don't occur again.

I hope this is helpful. Please keep us informed of developments and future consultations.

Jeremy Mustoe on behalf of Brighton Society

We fully support the principle of publishing an SPD to guide potential development on the Toad's Hole Valley site which will reduce the risks of potential developers coming up with inappropriate proposals, and provide more certainty for them in formulating proposals which will be acceptable. It will also inform the existing community and residents of the design parameters which are seen as being appropriate for the site, and help realise the opportunities in making this site - which is the last site of a significant size within the city - an exemplar of good design and good practice and which has the potential to set a precedent for future development proposals both locally and nationally.

There are many good ideas within the draft SPD, but we would like to make the following comments.

1. Scale and form of the development.

The draft rightly avoids being too prescriptive in describing specific solutions to this topic and concentrates mostly on suggesting appropriate numbers of new dwellings and anticipated densities. But it is specific in suggesting higher buildings (up to 6 storeys) in the lower areas of the valley. We disagree strongly with that suggestion for three reasons:

(i) higher buildings are not the only, or the best way of providing higher densities; we have proved that high densities can be achieved with low rise buildings laid out (loosely or formally) around courtyards. This solution also creates highly usable open space for either public or private use. If any form of higher density development is proposed in the SPD it should include other options other than just six-storey buildings.

(ii) the height of development within the site should respect the scale of the existing housing bordering the site to the east of King George VI Avenue - which as the photograph in the draft SPD shows - is a maximum of four storeys. We consider that lower buildings should be located towards the eastern, southern and western edges of the site, only rising higher if necessary in the central part of the east/west axis through the site - perhaps to relate to the location of the commercial and community hub.

The possibility of locating higher density residential over office and retail commercial development should also be suggested where appropriate, to ensure that the available land is used as efficiently as possible.

(iii) we think the policy of suggesting higher buildings in the lowest part of the site is wrong - this will have the effect of concealing the considerable dramatic level differences of the existing topography. The existing landscape features should be emphasized not disguised.

2. Transportation.

The SPD needs to insist more emphatically upon a comprehensive traffic and transport analysis being carried out. Ideally we would have thought that this should be initiated by the Local Authority, as all the information in terms of likely traffic and people numbers can already be estimated. 700 new dwellings, a school and commercial developments will generate an enormous number of new journeys and have a major effect on the already busy existing arterial and local residential road network, particularly at rush hours.

The options for access to and exiting from the THV site are very limited - perhaps only two possibilities exist, one a shared entrance with the Court Farm development near the top of King George VI Avenue, and another at the bottom near the already dangerous junctions with Goldstone Crescent and Nevill Road. It must be possible for the Highways Authority and the Council to come up with some sensible solutions to a very real problem which can be discussed with the local community rather than relying on a developer coming up with proposals which inevitably will seek to minimize his own commitment to resolving what are potentially serious traffic safety and congestion issues.

Public transport to and from the site is also something which we consider should not be left to the developer to deal with. The site is only served by the fairly infrequent 21 and 21A services via Goldstone Crescent. It seems to us that this too should be the subject of discussions between the Council and the relevant bus companies. There is no reason why this should not be done now so that the results can inform a potential developer and ensure that adequate proposals are incorporated into his designs at an early stage.

3. Infrastructure.

The drainage run-off from the steeply sloping site will be considerable once hard surfaces are introduced. We note that SUDS are proposed, which is fine, except that they will be unlikely to deal adequately with the amount of extra water run-off likely to be generated. What will the effect be on the existing drainage infrastructure in the local area, particularly the Goldstone Valley? This needs to be investigated in advance by the Water Authority and the Council, and once the results of that study are known, a decision will be needed on who pays for the drainage improvements in the adjacent residential areas should they need to be upgraded?

4. Court Farm.

Now that the proposals for 74 new dwellings at Court Farm have received planning approval, it seems strange that this is not yet acknowledged or mentioned in the draft SPD. This scheme, and any subsequent amended proposals, will have quite a major effect on many of the issues discussed above. This has to be a factor which should now be included for discussion in the final version of the SPD.

We trust that you will take account of the points made above in formulating the final version of the SPD.

Hazel McKay on behalf of the **Campaign to Save Toads Hole Valley**

1. Introduction

- 1.1. The campaign group's objective was to protect Toads Hole Valley from being released for development. Now its objective is to protect the valley from inappropriate development.
- 1.2. Releasing a site for development does not guarantee the creation of a successful suburb. Sadly in the UK, there are many examples of failing suburbs that started out as utopian dreams.
- 1.3. The development of Toads Hole Valley could create a new neighbourhood that is a credit to the city, a neighbourhood where people want to live, or it could create an arid suburb exhibiting multiple problems of accessibility, maintenance and social issues, where substantial additional investment would be required within a few decades.
- 1.4. To create an attractive new neighbourhood, the development brief needs to be appropriate to the size and geography of the site. The vision for the site should embrace the contours and existing landscape of the site, creating a new development that emphasises the existing downland landscape, as opposed to importing a built form from a completely different locality.
- 1.5. The brief must properly address the serious challenges posed by the site's location:
 - Toads Hole Valley is isolated from neighbouring areas by the A27, King George VI Ave and the steep bank of the SNCI;
 - King George VI Ave, which is the only road giving access to the site, is itself steep and dangerous;
 - There is no obvious way to serve the valley with a viable bus service.
- 1.6. These very important issues were raised by the Campaign at the public inquiry, but they are still being given scant consideration by the city council in the draft supplementary planning document (SPD).

2. The Vision

- 2.1. The Campaign is strongly of the view that the vision for Toads Hole Valley presented in the draft SPD is not appropriate to its location. The SPD proposes a dense urbanised neighbourhood akin the New England Quarter, which has of course a town centre location, adjacent to Brighton station. Toads Hole Valley has a completely different geography being a downland site in the urban fringe, well away from the vibrant centre of Brighton or the busy areas of central Hove.
- 2.2. Its greatest assets are its sweeping contours, its proximity to the South Downs National Park (SDNP) and its access to the A27. The magnificent undulations of the downland should be magnified and enhanced by the development, not obliterated by tall buildings.
- 2.3. Whatever words of exhortation appear in an SPD, a suburb of 700 dwellings in the urban fringe will never become a vibrant inner city neighbourhood. Even if the number of dwellings were to be doubled, it would still only be a small neighbourhood on the urban fringe. Also with the best will in the world the valley will only ever have a basic bus service connecting it with the centre of the city.
- 2.4. Instead of trying to import an alien form of development into Toads Hole Valley, the new suburb should take full advantage of the valley's natural assets: its splendid downland setting, its sweeping topography and its magnificent views out to sea.
- 2.5. This will be a neighbourhood for those seeking a quieter life away from all the colour and stresses of life in the central of the city, and at its heart the SPD should recognise that fact.
- 2.6. There is a well tried and tested model for new suburbs; that model is the garden suburb inspired by Ebenezer Howard and Raymond Unwin in the 20th century; it is still highly recommended by the Town and Country Planning Association, which has adapted the model to the needs of the 21st century, and is frequently recommended by government for new developments. In responses to previous consultations the Campaign has asked the city council to adopt the garden city model.

2.7. An SPD founded on garden suburb principles would respond to the valley's location and landscape and would create a new neighbourhood that sits comfortably alongside its neighbours. Creating false visions of a vibrant utopia is only likely to lead to disappointment.

3. Context

3.1. Strategic views

The proposal to define and protect strategic views is welcomed, but there does not appear to be any proposal to protect the splendid views of the sea that are a feature of the Toads Hole Valley area.

Regrettably, the photos on page 7, which should show the sea, were taken when visibility was very poor. It is suggested that the views should be analysed again on a clear day, and a cone defined that would protect critical views of the sea.

3.2. Access to the South Downs National Park

The proposal to construct a bridge over the A27 that would reconnect north Hove with the national park along the route of the former Dyke Road railway is welcomed. Such a bridge would draw existing Hove residents into Toads Hole Valley on route to and from the SDNP, thereby helping to integrate the new development with the existing neighbourhoods.

4. Housing and built form

4.1. The built form of housing in Toad's Hole Valley should follow and enhance the sweeping curves of the downland landscape, with the new dwellings sitting within the landscape, as opposed to allowing the development to destroy the Downland landscape.

4.2. This would only be achieved with a low-rise development; the high-rise buildings proposed for the valley floor should be rejected as they would interrupt and obscure the contours of the downland. It is pointless preserving fine views of distant landscapes, if the landscape of the development itself is not pleasing to the eye.

4.3. Furthermore, the emphasis should be upon achieving a high quality environment that respects the landscape as opposed to prioritising the number and density of dwelling units delivered. Respecting the downland landscape should trump achieving any specific numerical targets.

4.4. The aim should be to create a garden suburb, with densities and styles of dwellings that are compatible with the adjacent neighbourhoods. However, it is unlikely that this will be achieved with densities three times that of the Goldstone Valley, as 75 dwellings per hectare implies.

4.5. Terraces of dwellings where the flat roof of one house supports the garden for another may be novel, but they would create problems for maintenance and would probably be difficult to finance.

4.6. Car parking

A requirement of policy DA7 that at least half the dwellings should have 3+ bedrooms is appropriate to the site's suburban location, but the car parking standard of one space per dwelling and one visitor space for two units does not reflect the realities of suburban life. As soon as children are old enough to drive, they wish to obtain a driving license and, having obtained a license, seek to own a car.

4.7. It is absurd to suggest that this trend can be resisted in the suburbs, given that evening and weekend bus services are so poor. If the dwellings are not constructed with adequate car parking, there will be overspill car parking into the Goldstone Valley, creating conflict between the new residents of Toads Hole Valley and the existing residents in the Goldstone Valley.

4.8. Affordable housing

The draft SPD speaks of optimising the provision of affordable housing provision and the chair of the planning committee suggested in a BBC radio interview that the percentage of affordable housing could be negotiable. That approach is not acceptable; it is the demand for affordable housing that drives the city's housing targets and has led to the release of Toads Hole Valley for development, a site that until recently was protected as an Area of Outstanding Natural Beauty.

4.9. The site is being sacrificed to help relieve the city's housing crisis; the city plan policy requires 40% of dwellings to be affordable because it is affordable units that are most needed; the requirement for 40% affordable on this green field site should be a requirement that is absolutely non-negotiable.

5. Neighbourhood centre and placemaking

5.1. The proposals for the neighbourhood centre lack credibility and are unlikely to be delivered.

5.2. Toads Hole Valley should have a neighbourhood centre, but the photographs on p15 accompanying the proposal show well-used public meeting spaces in busy central areas such as the Jubilee Square in Brighton. These spaces are well used because they have large catchment areas; they are not comparable to Toads Hole Valley with a catchment of less than a 1,000 dwellings. Another exemplar featured at the top of p17 shows an established urban park that also serves a much larger community than Toads Hole Valley. The SPD should feature exemplars of neighbourhood centres in small suburbs.

5.3. What should be visualised in the SPD is the type of centre that it is practical to achieve as the focus of a small suburban neighbourhood in the 21st century. The most successful nearby neighbourhood centre is the Grenadier, which has the advantage of being a transport hub and it has ample parking. However, even the Grenadier is serving a much wider catchment than will be served by Toads Hole Valley centre.

5.4. It is unrealistic to propose 6-10 shop units; that model featured in the 1950's and 60's and is not now appropriate, particularly given that the surrounding neighbourhood centres are struggling to fill much older units. The parades in Queen Victoria Avenue, Burwash Road and Hangleton Way/ Northease Drive each support only one convenience store, with the third parade also having an off license; other units in the parades are occupied by specialist shops and services seeking low value premises in tertiary shopping centres; they would not be looking to pay the rents demanded for new units.

5.5. So what could be achieved?

5.6. It is likely that one of the established supermarkets (Sainsbury, Tesco or Coop) would take a modest unit that would anchor the centre provided it had good parking for shoppers and was well located to attract passing trade. It is unlikely that restaurants, coffee bars or pubs would be attracted to a new suburban centre, but some units might be taken by services that would complement the supermarket, such as takeaways, a dentist or a vet.

5.7. Because there is a lack of doctors' surgeries north of the Old Shoreham Road, the neighbourhood centre should accommodate a large medical centre (with a pharmacy). Also the proposed community centre should be designed to serve the Goldstone Valley as well as Toads Hole Valley, because there is no community centre in the Hove Park ward. Locating facilities in the valley that would be used by the residents of neighbouring suburbs would further contribute towards integrating the neighbourhood with the old.

5.8. Whilst finding a suitable site for a secondary school was one of the drivers that pointed to the release of Toads Hole Valley for development, it is understood that the council has now found alternative sites for meeting that demand. However, it remains essential for a school to be located in Toads Hole Valley because, as acknowledged in the draft SPD, schools generate activities and employment that contribute to the success of a new community and support integration with neighbouring communities.

5.9. Contrary to the assertion in para 4.27, increasing the population of Toads Hole Valley from 700 units to 1,000 units, or even doubling it to 1,500 units, would make little difference to the viability of a neighbourhood centre. Of far greater importance would be its visibility and the availability of car parking to attract passing trade.

6. Protection of Flora and Fauna

6.1. Of very serious concern is the impact of the development on the extensive flora and fauna in Toads Hole Valley, an area that is gradually regenerating and maturing as native woodland, because it has not been managed by the landowner for many years.

6.2. It is important for the SNCI to be preserved and for it not to be disturbed by the new development. To achieve this, the SNCI should be securely fenced to separate it from the rest of Toads Hole Valley. Trees within the SNCI should be preserved and properly managed, because the city cannot afford to sacrifice any trees that are not killed by Ash Dieback, and because the woodland bank provides a rich habitat for wildlife.

6.3. A group should be established to manage the SNCI, but until such time as that can be organised, no changes should be made to the SNCI without the agreement of the Sussex Wildlife Trust. In particular, no new paths should be cut through the site, as the removal of trees and the construction of paths would inevitably disturb the wildlife that inhabit the site.

6.4. As it is inevitable that wildlife will be disturbed when development commences, it is essential

for wildlife corridors to be created so that animals may move easily and safely across the site and traverse the A27. It is, therefore, proposed that the bank adjacent to the A27 should provide one such corridor from east to west, and that area should also be securely fenced to protect it for that use.

6.5. Provision for wildlife to safely cross the A27 is an urgent requirement, because otherwise the animals would have nowhere to go when they are disturbed. A series of green underpasses should be created beneath the A27, so the animals may safely travel to and from the national park.

6.6. In order to protect the habitats within the SNCI, it is essential that no tall buildings are constructed anywhere near the bottom of the bank, as the shadows cast by tall buildings would disturb the wildlife. This, of course, runs completely counter to the proposal to locate tall buildings on the valley floor.

6.7. Throughout the development period every effort should be made avoid unnecessary disturbance to wildlife and flora. The phasing plan for the site should ensure that only the parts of the valley that are about to be developed are disturbed, that other areas remain undisturbed until they are brought forward for development.

6.8. Just prior to the development of any particular area, an assessment should be made of the flora in that area worthy of retention, in order to maximise the amount of natural vegetation that is retained.

7. King George VI Avenue

7.1. The policy proposals for King George VI Avenue are wholly inadequate.

7.2. King George VI Avenue presents serious challenges because it is steep, dangerous, and noisy but it is the main access road from the A27 into West Hove. It severs Toads Hole Valley from the existing suburb in the Goldstone Valley, but is bounded by hedgerows and grass verges that are not unattractive. At the same time it is the only road that gives access into Toads Hole Valley, other than the Dyke Road Roundabout.

7.3. The severance was recognised by the landowners whose Vision Document, which is still available online, explored three options: 'online', 'parallel realignment' and 'major realignment'.

7.4. Of the 'on-line option', it was stated that *'retaining the road on line would not offer any betterment for existing residents and a level of severance would persist'*, yet that is the only option now being advocated by the SPD.

7.5. The 'parallel road option' was criticised for having cost penalties likely to affect viability. In contrast the 'major realignment option', which rerouted King George VI Ave alongside the A27 reconnecting with the existing road at the Goldstone Crescent junction, was praised as follows: *'This would re-route the road wholly within the site, allowing for the best junction arrangement and existing junction enhancements possible. It would provide for full integration between Toads Hole Valley and Goldstone Valley with a significant green space provided linking but buffering the two communities.Issues of viability may pertain but these could be partially offset by the value of other roads that would have been required to access the development and by some development value offered by the release of the 'old road' land.'*

7.6. In contrast the SPD only recommends:

- 'creating a more built-up area feel to King George VI Ave with possibly street-facing frontages and some commercial uses with active frontages at ground floor level to provide a sense of spatial containment'
- 'physical measures such as central reservations and crossing points to change driver perceptions and behaviours'
- 'opportunities for safe pedestrian and cycle crossing along King George VI Ave edge using these opportunities to manage traffic flow'

7.7. These proposals would have no impact of the most significant feature of King George VI Ave, which is its steep gradient. That gradient makes it very difficult to adhere to the speed limits and very significantly increases vehicle stopping distances.

7.8. It is inevitable, given the geometry of the road, that encouraging pedestrians to cross King George VI Avenue would lead to more vehicle/ pedestrian accidents, and requiring vehicles to halt on the steep slope would lead to more vehicle/ vehicle rear end shunts. Usually the city council is adjusting road layouts to reduce the likelihood of vehicle/ pedestrian accidents; on this occasion the council is advocating traffic arrangements for a new development that would make more such accidents inevitable. How can this be reconciled with the council's duty of care to the public?

7.9. To improve highway safety and overcome the severance between Toads Hole Valley and the

Goldstone Valley, a major realignment of King George VI Ave, close to the A27, is essential, as recommended in the landowner's Vision Document.

8. Public Transport

8.1. The challenges of serving the Toads Hole Valley are not properly addressed in the SPD.

8.2. Existing bus services are shown on an accompanying map with the following comment: *'there are several commercial and financially supported bus routes and stops close to the Toads Hole Valley site's south and west edges that could be extended to support new bus services at Toads Hole Valley and/ improvements of services to existing communities and visitors to the SDNP'*

8.3. This statement is seriously misleading.

8.4. Service 21

The only service that runs close to Toads Hole Valley is the 21 with stops in Goldstone Crescent and King George VI Drive. It is a subsidised service that is roughly half hourly during the working day, virtually non-existent in the evening, with only one bus after 8pm, and a very poor weekend service. It is not the high quality frequent service envisaged by the SPD.

8.5. If the service 21 were extended into Toads Hole Valley, it would have to turn right out of Goldstone Crescent and continue up King George VI Avenue. This would be impractical as buses, even without passengers, need to have considerable momentum at the bottom of the hill (adjacent to Goldstone Crescent) to be able to climb up its steep slope. Usually they gather speed from the junction with Court Farm Road, so that they are already travelling at about 40mph when they commence the ascent of King George VI Avenue.

8.6. Service 5

Bus stops for this service shown close to Toads Hole Valley are near Downland Drive, which is at the top of the steep bank of the SNCI separating Hangelton from Toads Hole Valley. It would not be possible to divert a bus through the SNCI and it would not be practical to expect the residents of Toads Hole Valley to climb the steep bank to get to a bus stop in Hangelton.

8.7. The service 5B passes through the Hangelton Road/ Court Farm Road junction, with a stop close to the corner. This stop would not be convenient for residents of Toads Hole Valley because the valley is separated from the bus stop by a steep descent to the Goldstone Crescent junction and a steep ascent either to the bus stop, or into the valley, depending on the direction of travel.

8.8. Were the service 5B to be rerouted into Toads Hole Valley, it would be most detrimental to the Hangelton bus services. Currently all the No.5 services pass through the Grenadier, which creates a high degree of certainty for the residents of Hangelton and West Blatchington; they can walk to the Grenadier to be sure of catching a bus. Also the frequency of the service 5 buses at the Grenadier creates a suburban transport hub, which underpins this small shopping centre that continues to thrive. Any reduction in the frequency of the buses serving the Grenadier would detract from its continuing viability.

8.9. Were either the **service 5B** or the **service 27** to make a detour into Toads Hole Valley it would greatly increase the journey times to Hangelton and Westdean, respectively, making them absurdly long, thereby damaging those existing services.

8.10. Because of its location and geometry, it will never be easy for buses to serve Toads Hole Valley, but to increase its attractiveness to bus operators, there should be a bus route through the site from top to bottom, with bus stops at several different levels on the hillside, and there could be a dedicated gateway to deter rat-running. To encourage bus usage, the landowner should support the bus service until such time as it becomes viable. Even then, it should be envisaged the service would only be half hourly during the working day, every 20 mins at best, which would hardly discourage residents from owning and using cars.

9. Responsibilities of landowners and developers

9.1. It has long been recognised that planning alone cannot deliver a successful new neighbourhood, and that message is reiterated in the latest research for the Royal Society of Arts ('Scale to Change' by Johnathan Schifferes). Planning policy and development control can steer the development of housing and other facilities, but the active participation of the landowner is required to build a successful new community.

9.2. The landowner or their developer must provide adequate resources and energy to embed community development initiatives, or the landowner could endow a community land trust or similar to assume those responsibilities.

10. Conclusion

10.1. The ambition of the SPD to create a successful new suburb, and that is welcomed but, as drafted, the SPD demonstrates little sensitivity to the location of Toads Hole Valley on the urban fringe, surrounded by well-established suburbs. To be a good neighbour and address the serious challenges posed by the site, some fundamental rethinking is required.

10.2. The Campaign to Save Toads Hole Valley recommends revisions to the SPD so that it:

- Creates a new neighbourhood where people want to live by following the established principles of garden suburbs
- Integrates the new community with existing neighbourhoods by:
 - rerouting King George VI Ave to overcome the severance of Toads Hole Valley from Goldstone Valley, o incorporating health and community facilities serving the wider area,
 - securing a new school within Toads Hole Valley to support community development,
 - constructing a new foot bridge over the A27 to reconnect Hove to the SDNP following the route of the former Dyke Road railway.
- • Recognises that it will be difficult to serve the valley by public transport and as a consequence adopts a generous approach to car parking.

Chris Todd on behalf of Brighton & Hove Friends of the Earth

On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to welcome the opportunity to comment on the Supplementary Planning Document for Toads Hole Valley. The development of this site presents many opportunities for the city but to realise these the SPD needs to inspire a fresh approach to traditional development patterns.

While the strategic approach is generally supported and sound, our fear is that it won't bring forward a truly cutting edge development which could act as a show case for sustainable living in the 21st century. It risks allowing a slightly improved bog-standard development that has not served society well over the past few decades, building in car dependency and wasting opportunities to give people real choice on how they get around and to lead healthy lives.

To avoid creating rabbit hutches for future residents, BHFOE would like to see minimum space guarantees where possible, linked to higher density designs being allowed. This could bring dual benefits in providing many more much needed homes while also ensuring these homes are fit for living in. Terraced buildings or blocks of flats / homes would offer space (land) advantages as well as higher energy and material efficiencies and should therefore be encouraged, especially over detached dwellings.

Innovative designs would also allow green space to be provided not only within community areas, and this needs to be more than sterile grass deserts, but also green space on and around new buildings as roofs and green walls as appropriate. Indeed, while this could help soften the edge of the development and its impact on the South Downs National Park, an important consideration here, it might also make it possible to increase the amount of development. Local and native plant species should be specified wherever possible. Aspects could also be used for growing food.

A higher density development is essential to provide a larger market for public transport as without a critical mass on site, it is unlikely that services will be anything other than low frequency or severely restricted in the evenings and weekends. This is particularly important given the pressures on local authority budgets and the likelihood that the Council is not going to be able to subsidise bus routes in the future. Any development needs to be able to support commercial bus services not just at the busiest times, but also regular (at least half hourly and preferably more frequent) evening and Sunday services. This will ensure residents have a real choice of transport and don't feel compelled to own a car and should be a factor to be considered when assessing the scheme's overall carbon emissions.

It is important that whatever is built in Toads Hole Valley, it isn't another dormitory suburb and that a real community is created with a range of affordability and sizes, suitable for young, old and

those in-between and for rich and poor. Local facilities such as shops and a GP surgery, etc. need to be provided and new public buildings should to be multi-functional and flexible in their use. This will allow the community to meet and hold events, for example, in the local school, without having the cost and the use of scarce land wasted on a separate community facility. The same goes for access to sports facilities and the school playing fields.

There also needs to be flexibility in design to allow buildings, say for a nursery or other use, to be adaptable as the demographic needs of the community change over time, probably requiring more care facilities for older people with an aging population.

BHFOE has mixed feelings about the provision of office space on the site. As it stands the site is really only accessible by car and therefore it could be quite exclusive. There are many families in Brighton & Hove who don't own a car and would find it hard to access jobs there. This is why it is doubly important to ensure there is a high density development on this site to provide a critical mass for high frequency bus services, 7 days a week. The other danger is that without creating a sense of place in the area, office workers could be encouraged to drive into the city at lunch times, generating traffic and congestion.

The consultation document mentions Stockley Park as a good example of new office developments, but on transport it is quite poor. Despite the area being fairly flat its provision for cycles and to some extent pedestrians is not very good and the surrounding road network does not encourage cycling, in fact probably deters it. It does have bus access, but this is not enough on its own and much more could have been done, relatively cheaply to reduce car use. This is going to be important for Toads Hole Valley and it will be essential that any SPD spells out the need for high quality pedestrian and cycle links, both within and out into the wider community. For cyclists that means proper sealed surfaces and not cheap gravel tracks which are only suitable for mountain bikes and do not provide fully accessible surfaces. That is one of the gripes with the current route linking up to the Dyke Trail (as pictured in the consultation documents).

BHFOE is most disappointed that there seems to be little imagination or ambition to achieve a development that will deliver a high quality environment for all age groups, opening up the space between buildings into a more public and social space. The layout and design of the streets and housing will be fundamental in determining how the development is used by people. This will then impact on their health and wellbeing.

The problem with streets in the city are that most are dominated by the motor car, either through the sheer number parked there or the traffic using them. This results in very little social space and squeezes out much activity including deterring walking and cycling. A central strand of this SPD should be to aim to change that for this development. It is a once in a lifetime opportunity to create a new approach, given how the site is a blank canvas.

BHFOE is not advocating a car free design, although it is promoting a car free street design, apart from access for loading. Siting car parking away from the homes will also encourage more people to walk and cycle or to catch the bus and not have the default of jumping into the car because it is the first thing they see when they walk out of the front door. This combined with high quality pedestrian and cycle routes alongside frequent bus services would be the best way of minimising the number of cars on the site.

Linked to this BHFOE objects to the suggestion that office car parking could be used as informal park & ride. While it might be a suggestion in the City Plan it is without any foundation as a robust transport policy and lacks any credibility in terms of reducing car use in the city. If it is to truly reduce car use in the city it needs to be accompanied by a reduction in city centre parking. Otherwise it would just generate more traffic and congestion on the A23 and A27 as more people are encouraged to drive to the city while wasting valuable space on Toads Hole Valley which could be put to better uses. It might also encourage developers to overprovide car parking on site, again wasting land which could be put to more productive uses.

Instead, BHFOE would prefer the office car parking to overlap with the housing development car parking to minimise the footprint of land required for car parking on the site. People using the car

to commute to work would free up spaces that could then be used by office workers arriving by car. Similarly, when the office workers leave for home they would free up spaces for those returning home from work. While this wouldn't work for everyone it could significantly reduce the overall amount of car parking required.

If you have any questions about our comments, please do not hesitate to get in touch.

Paz Chauhan on behalf of the Goldstone Valley Facebook group

We have attempted to offer solutions to some of these concerns as we fully understand there is a need for affordable housing in the area. However, the proposed development is a sizeable one and will undoubtedly have impacts on the lives of all the members of this group and many more residents in the Goldstone Valley area. Therefore, we would welcome and meetings with council members and developer representatives to discuss any of the items we have raised.

These are the primary concerns which have been voiced in our group:-

There will undoubtedly be extra traffic along King George VI Avenue (KGV1) which we already consider to be an extremely dangerous road. There are two junctions off KGV1 that have been the cause of injuries and fatalities over the last 5 years. Residents who have houses backing onto KGV1 Avenue have reported vehicles careering through their back fences and 5 years ago 2 dead bodies were found following a motorbike accident. We are extremely worried that the removal of any realignment proposal will only serve to exacerbate what is already a very serious road safety problem and we urge you to strongly reconsider the re-routing of KGV1 to ease congestion in the Goldstone Valley area.

We need a safe and sustainable road infrastructure. As the current road network barely copes at present. Planned improvements are a priority.

Public transport in the area is limited to a couple of bus routes which provide an already-reduced service. The majority of residents rely on cars and it is to be expected that new residents will also rely on cars, resulting in increased movement in and out of the development and through surrounding areas. Potentially, Goldstone Crescent and Neville Road, which are already heavily congested during peak traffic periods, will become a rat-run from the development into Hove. Easing of traffic through KGV1 realignment, as per the original plan, will surely be a huge step in mitigating this.

There is concern about the overspill of parking. The planning guidelines do not allow for enough car parking on the development, so there is a fear that new residents will use our streets. We already have commuters using our streets as a free park-and-ride (particularly along Goldstone Crescent). Parking implications from previous developments (Legal & General, the Bilingual School) are already impacting on local residents. The high number of schools in the area, particularly around Nevill Road, already means we have to cope with a high volume of traffic and parked cars (in addition to the twice-daily rush hour). A possible solution would be to allocate a whole parking space per household for visitors (currently only half a space is allocated).

The expectation of higher density, taller buildings in the development, seems out of keeping for the area. Goldstone Valley is a town fringe location, a valuable buffer between the city and the South Downs National Park. To impose an intensely urban development, one which is far denser than Goldstone Valley, seems to work against this principle. The current density of the Goldstone Valley area surrounding THV is 37.5%. The SPD proposes the density of THV to be between 50% and 75%, so naturally there is a concern that this development is overbearing and out of scale with the surrounding area potentially leading to a loss of amenity for the Goldstone Valley residents.

Whilst the group appreciates the need for additional housing in Brighton & Hove, we are concerned about the further loss of quality of life for our residents and business owners, bearing in mind that Goldstone Valley has already been under significant pressure in the last years, both from development sites and the resultant increase in traffic. There is currently inadequate infrastructure to cope with further development, particularly one of this size.

We hope that rather than just allowing an incongruous new development, you will listen to the voices of those who will be directly impacted by this on a daily basis. We would also welcome the idea of holding meetings between the council and Goldstone Valley residents. This will enable us to understand and appreciate the bigger picture and give you the opportunity to respond to our concerns.

Roger Hinton on behalf of the Regency Society

The Regency Society was broadly supportive of the first iteration of the Draft City Plan (City Plan Part 1). In particular the Society has supported the proposal, as set out in Section DA7 of the City Plan, to designate the area of land known as Toad's Hole Valley for mixed use with a predominance of housing. Toad's Hole Valley, it should be noted, is a triangular area of scrub-land with a gross area of 47 hectares that is bounded by the A27 by-pass and King George VI Avenue. The Council has now issued a draft SPD for the site and has invited comments. Whilst the Regency Society supports the general objectives of DA7, it finds the draft SPD to be far from satisfactory.

At a general level, the SPD fails to offer specific guidance to developers – much of the document consist of vague homilies with which it would be hard to disagree but which are totally lacking specificity: much of it reads as if it has been cut and pasted from other documents. The SPD contains nothing that could be construed as a masterplan or an urban design study for the site. It avoids offering any concrete proposals for solving the traffic problems associated with George VI Avenue or for defining a strategy for accessing the site.

In drawing up the SPD the Council's hands are clearly tied by the fact that it does not own the land and can therefore exercise only limited proscriptive control over how the present owners choose to develop it. The owners, already divided into several sub-owners, have recently sold a 50% share of the land to a development company. There seems to be nothing to prevent these separate owners from dividing the land into smaller parcels and developing it in autonomous stages over a number of years. Under these circumstances it would be difficult for the Council to force the owners to produce an overall master-plan for developing the whole site.

In lieu of a masterplan the SPD offers a schedule of land-use. After excluding Court Farm at the north-east corner and the strip of land along the south-western border which is designated as a 'Site of Nature Conservation Interest', the site is said to have a developable area of 37 hectares. The schedule allocates 5 hectares for education, 3.5-4.5 hectares for business, and 2.5 hectares for open space, leaving an area of 26 hectares for housing. It then specifies housing densities in a range from 50 to 75 dwellings per hectare. However, it sets a minimum target of only 700 dwellings which is equivalent to an average overall density of 27 dwellings per hectare (approximately 11 per acre).

Given the shortage of housing land within the City and the substantial house-building targets to which the Council is committed under the City Plan, this minimum target seems overly modest. If the 26 hectares were to be developed at the suggested range 50 to 75 dwellings per hectare the resultant totals would be between 1,300 dwellings and 1,950 dwellings.

On the other hand the SPD fails to take into account the loss of developable land that would result from the inherent difficulties of the site – it is steeply sloping, its northern and south-western boundaries are affected by traffic noise from the A.27, and it can only be accessed from the busy George VI Avenue. A more realistic estimate for the net area would be around 20 hectares. But even 20 hectares, if developed with a mixture of housing forms, could support the development of far in excess of 700 units. If the range of target densities were to be extended from 50 dwellings per hectare (eg Stanford Estate) through 100 dwellings per hectare (eg the Hanover street grid) to 150 dwellings per hectare (eg Furze Croft / Wick Hall), it would be feasible to set an overall minimal target of at least 1,500 dwellings.

The Regency Society urges the Council to consider developing a simple master plan for the development which, amongst other things, would set out an outline urban design strategy, identify possible improvements to George VI Avenue and define preferred points of access to the site. It also recommends that the target minimum dwelling total be raised to a figure compatible with such an outline urban design strategy.

Thomas Fallon on behalf of the Goldstone Valley Residents Association

The City Plan DA7 specifies only a minimum of 700 homes and para 4.27 of the SPD confirms that as the 700 is a minimum and gives the opportunity to increase the housing provision to 'help create a more viable neighbourhood'. No indication of what is meant by more viable.

We are adamant that the correct infrastructure must be put in place to cope with a large development and that a full transport assessment needs be undertaken. The Bilingual School Travel Plan was nodded through by the Planning & Resource Committee without demur or any check on the figures plucked out of the air, which was an absolute disgrace. It is imperative that this doesn't happen again, even though the council are putting in the right words and phrases, it doesn't mean a thing' unless they stand firm on principles.

We fear that the majority of traffic generated by this development will access the city via

Goldstone Crescent which is already very congested during the rush hours. When the Bilingual School total complement of 630 pupils is reached in a few years, the traffic in Goldstone Crescent, together with that of Toads Hole Valley will result in total overload and gridlock.

Para 4.54 of the SPD states that the number of houses will affect the demand for travel and will determine the level and viability of the introduction and operation of a regular bus service. The SPD should have specified the exact number of houses to be built on the site otherwise prospective developers will squeeze as many as they can to generate maximum profit. The SPD should state that King George VI Avenue be re-routed and the current road become a quiet backwater, as suggested in the early days of the Plan. In fact, para 4.56 of the SPD indicates that there should be a more build-up area feel to it and include commercial users with active footages some 3 metres from the road. It seems the original concept of the road looping through the development to take away traffic from the GVRA area and deliver it to the roundabout at the top of Dyke Rd Avenue has been given the thumbs down.

Anna Budge on behalf of the **National Trust**

The Trust would like to thank Brighton and Hove City Council for the opportunity to comment on the draft Toad's Hole Valley SPD (THV SPD).

The National Trust owns and manages over 270 hectares of land at Devil's Dyke and Newtimber Hill to the north of the Toad's Hole Valley development site. In addition, the Trust owns and manages Fulking Escarpment and Edburton Hill which is approximately 125 hectares in area. All of this land sits within the South Downs National Park but has a strong link with the City as it provides a significant recreational resource to the City's residents and visitors.

The Trust has carefully considered the document and is pleased that the City Council responded to the consultation on the Issues and Options during 2016 and has chosen to produce a comprehensive SPD to guide the successful delivery of the Toad's Hole Valley development.

The Trust generally welcomes the guidance provided by the SPD and supports the recommendation for a comprehensive masterplan to be produced for the site in discussion with the relevant authorities. The Trust supports the inclusion of design coding as a means of securing high quality design across the site, but feels that this maybe could be strengthened to meet the guidance contained in the design section of the NPPF (paras 58-62).

The Trust has noted that the document makes reference in a number of places to creating better access to the SDNP and we would generally welcome such efforts to secure better connectivity to the landscape beyond the site for recreational opportunities. However, we do consider that it is important to ensure that best use is made of securing appropriate on-site open space provision and the enhancement of the existing SNCI as there are a number of sensitive, nationally significant and priority habitats in close proximity to the development which could be harmed through over use.

The document refers to the importance of protecting the setting of the SDNP and the Trust supports the aspiration to enhance its setting. There is concern about the limited scope of the document in identifying the strategic views around the site as the Trust considers that the impact that this development will have on the landscape character of this part of Sussex should be fully understood and responded to from the outset. The Trust does recognise the requirement for a comprehensive LVIA, alongside a landscape sensitivity assessment, however it does consider that the SPD could be strengthened to better direct the consideration of the wider impact that the development will have on the landscape, particularly given the protection that National Parks and their setting are given in the NPPF. Linked to this is the potential need for re-sculpturing of part of the site that is referred to within the draft document. The Trust considers that reference to this within the document should be heavily caveated given the potential for a significant impact on the landscape character of the area and the setting of the National Park and that its use should be strictly limited within the development area and well justified.

The Trust hopes that these views can be taken into account when considering how to take forward the SPD and is happy to provide any further information or clarification required.

Helmut Lusser on behalf of the **Hove Civic Society**

General comment. It's right that the guidance to developers shouldn't be over-prescriptive - we should certainly be encouraging design teams to come up with creative and imaginative solutions. However, the draft could do more to suggest a stronger steer in several important areas - it often feels like the "challenges" are being stated, without much steer as to the kind of solutions that might be found.

Masterplan. We support the line taken that a masterplan should be produced and agreed with the Council as a first step, before planning applications are drawn up. We believe this should apply to the whole site – especially now that 50% of the site seems to have been sold to an investment fund. This suggests to us that the council needs to take a much stronger role than hitherto envisaged in setting the parameters for the site. The site must not be allowed to develop without a clear overall structure to the plan. The guidance is also right to expect the phasing of development to be planned and managed in a coherent way.

The separation of the top end of the site (the Court Farm site) is unfortunate. As the existing planning permissions for that site have not been implemented yet, there would be real public benefit in pressing the owners for a solution in which the Court Farm development is made consistent with the emerging masterplan. We also believe that there is scope for more commercial use at his point, being so close to the motorway network.

Housing need. Given the strategic importance of the site for the provision of new housing in the city, there is scope to be substantially more ambitious in the number of sustainable homes to be built – we believe the City Council should aim to stretch the minimum targets set in the City Plan. The slope of the site is awkward, but imaginative design could maximise the use of the valley bottom for taller buildings (higher than the suggested 6 storeys) with heights “stepping down” as the slope rises. It should be possible to design infrastructure and other community facilities to support a higher density of occupation on the site.

Creating successful transport links and access is rightly identified as a big challenge, but developers could do with more help about possible approaches to meeting that challenge. In particular, the pressure on existing local roads is such that public opinion will be strongly critical of a scheme which does not have a convincing answer to that challenge.

A new neighbourhood which connects with the existing. The site is strongly bounded along all three sides of its triangle. It could easily end up feeling isolated from other communities. The guidance should give more positive steers about ensuring integration and connections with the existing neighbourhoods adjoining its SE and SW boundaries (Goldstone Valley, West Blatchington and Hangleton).

Roger Crouch on behalf of the **Hove Park Forum**

After consultation with our members the main points are as follows:

The language of the SPD encourages the idea of an integrated mini town which is inappropriate for a fundamentally semi rural setting. The suggestion is to replicate the New England Street development which is sterile and harsh with very high density living and is very 'Urban'. Any development in Toad's Hole needs to be sympathetic to its undulating semi rural environment and should be a calm, airy and safe space such that people feel relaxed and not 'edgy'. It needs to be a 'garden suburb' without large tower blocks. Buildings should be no more than six storeys high and they should be at the lowest point on the site. We do not want a ghetto which detaches people from a sense of ownership of their area.

A more soft style of building are the curved roofs of City Park which integrate quite well into the sky and relieve the feeling of dominance that tall buildings give.

Of great concern to our area is the increasingly high volume of traffic coming through it.

The use of Hove Park has just exploded in the last two years particularly with the arrival of the new Bilingual school. The school is not yet half full and nearly all the parking slots are full. People

have 'discovered' the Park and cars now park around it for much of the day. Goldstone Crescent has become more dangerous because of it. Through traffic to Portslade and Brighton and Hove needs to be encouraged along the arteries already provided so as to minimise rat running through the Hove Park area. These roads are Dyke Road Avenue, King George V1 and Nevill Road and King George V1 and Hangleton Road (A2038)

King George V1 Avenue should be retained as it is the main road into Portslade. Creating turnings off it or trying to 'calm' the traffic and allowing pedestrian crossings will just slow the traffic making journey times significantly longer and frustrating. It is also a very steep road and there is a significant risk that accidents will increase. It is certainly not practical to have 'street-facing frontages'. There could be a turn off from the Avenue close to the roundabout and just below the 'Farm' at the top of the hill which would then be the main access into the Toad's Hole area. There could be a roundabout at the bottom of the hill to allow access to the Toad's Hole site. This would help control the amount of traffic through the area and help give it that 'garden suburb' feel. If there are to be some offices it would make it a more relaxing and safe space in which to walk.

Creating a 'more built up area feel' to the Avenue, that the SPD suggests is precisely what we don't want.

Parking should be more than just minimal if it is to attract families. As the SPD makes clear the steeply sloping topography allows for cost effective parking under the buildings which in turn hides the vehicles and reduces on-street parking.

The quality of the architecture and materials must be first rate. This is an important site and probably the last large greenfield site in the City. Exposed concrete should be minimal as it doesn't weather well. Use of large areas of exposed timber should be resisted. The New England site is made more stark by its extensive use. There should be no vivid colours externally 'shouting' at people just to 'challenge' their sensibilities.

There is a great opportunity here to make a 'low energy estate' which can set new practical standards. Building insulation should be to Scandinavian levels so as to minimise heat demand.

Apart from the SNCI there should be some tree planting across the site as this relaxes people and softens buildings.

Steve Ankers on behalf of the **South Downs Society**

4 The South Downs Society is grateful for the opportunity to comment on the Toad's Hole Valley (THV) draft Supplementary Planning Document. The Society has nearly 2,000 members, our core business being campaigning and fundraising for the conservation and enhancement of the landscape of the South Downs National Park (SDNP) and its quiet enjoyment. We are the national park society for the South Downs.

National Parks hold the highest level of planning protection and the SDNP is designated an International Dark Sky Reserve.

Although this site lies outside the boundary of the national park, any development at Toads Hole Valley will impact on the park and the Society has consistently taken a keen interest in its future.

Toads Hole Valley was designated part of the Sussex Downs Area of Outstanding Natural Beauty (AONB) back in the 1960's and retained that status even after the A27 bypass was built, but was excluded from the SDNP when it came into being in April 2010. The Society was disappointed but accepts firstly, that this land no longer has national recognition and secondly, that it was also removed as a designated Urban Fringe site.

In response to the earlier Housing Delivery Options Paper and consultation on the City Plan Part One, we objected to any proposals that provided for development at THV in favour of new housing being located in the most sustainable sites, ensuring that brownfield and low landscape value sites are developed first. However, we accept that Policy DA7 Toads Hole Valley in the now adopted City Plan Part One sets out the principle for developing the site. Our comments reflect this position. We do not comment on every paragraph but those we consider most pertinent to the

Society and most importantly to the conservation and enhancement of the SDNP.

We make no comments on Sections 1-3 relating to the background.

4. Development Response

4.1 Noted.

Submitting a Planning Application

4.2 Masterplan. We support the concept of the preparation of a Masterplan. Whilst its preparation is the responsibility of the planning authority, we consider that, due to the sensitivity of the site, it will be an imperative to consult with a diversity of stakeholders, including the local community, to assist in determining the outcome.

4.3 Design Code. We consider a Design Code in support of the Masterplan goes beyond being helpful but is essential to ensure consistency and the correct design outcomes.

4.4 Agreed. The final approval of both the Masterplan and Design Code should be made by the planning authority following consultation with stakeholders.

4.5 Agreed.

4.6 Agreed.

4.7 Setting of the National Park. This is a major issue for the Society. The scale, form, height and siting of any development must be assessed in terms of its impact on the setting of the SDNP. Section 62 of the Environment Act 1995 lays a statutory duty on the authority to have regard to the designation of the national park, the first and primary purpose of which is to conserve and enhance its natural beauty, wildlife and cultural heritage.

Amounts of Development

4.8 & 4.9 Noted.

Masterplanning & Landscape-led Design

4.10 to 4.13 We will generally welcome and support proposals which are landscape-led.

4.14. **Strategic Views.** Strategic views both in from and out to the SDNP extend far beyond the three shown. The site is highly visible from the wider expanses of the Park including the South Downs Way National trail, the Monarchs Way and other public rights of way. We would expect this to be comprehensively covered by a Landscape and Visual Impact Assessment.

4.15 **Building Heights.** We broadly support the concept that higher density tall buildings should be located at the valley floor. This would be to minimise any visual impact from the National Park. It is too early to determine whether buildings will need to be limited to say, 4, 5 or 6 storeys.

4.16 & 4.17 **Building, Siting, Massing & Form.** Agreed. We would fully support the introduction of sections and 3D modelling of strategic views. This is crucial to assessing and potentially minimising negative impacts.

4.26 to 4.30 **Housing** – The Society recognises that the City Plan policies CP1 and DA7 provide for a minimum number of 700 houses at this location. However, any opportunities to increase this minimum should not be to the detriment of the surrounding environment and the SDNP. The Society has previously indicated that both the design and density of any development on the THV site would be crucial if it is to avoid damaging the views in and out of the Park. We welcome opportunities for a high standard of building design. Where appropriate, materials should be used that reflect or enhance locally distinctive building styles, and make prudent use of natural resources. We will support housing which complements its setting, seeking to ensure its assimilation into the landscape. We will support housing which responds to the effects of, and reduces its contribution to, climate change.

4.31 to 4.34 **Offices** – Noted. No comment at this stage of consultation

4.35 to 4.39 **Education** – Noted. No comment at this stage of consultation

4.40 to 4.46 **Community and Retail** - Noted. We would support the recommendation of the SDNPA that provision is made for a SDNP Interpretation/Education facility and pedestrian/cycle links to the Park from such a facility.

4.47 to 4.50 **Environment** – The Society welcomes the expectations of the City Plan Part One that development will be fully sustainable and that the UNESCO Biosphere Reserve Objectives will be integrated. The Society will support appropriately sited low carbon development including renewable energy technologies which do not significantly affect the valued landscapes and townscapes and natural environments which include the adjacent SDNP.

4.51 to 4.57 **Transport & Travel – Alongside the Setting of the Park this is a major issue for the Society.** Our concerns relate to the potential for an increase of traffic in general and along

the A27 and the Devils Dyke Road in particular, with the consequential impact from increased traffic movements across the SDNP. Whilst we generally support the opportunities as set out in these paragraphs we will be seeking positive initiatives for:

- The management of the demand for use of the car;
- The reduction of car dependency by active support of walking, cycling, and public, community and voluntary transport;
- Ensuring that travel costs reflect the environmental and social impacts of transport possibly through fiscal incentives;
- Reducing speed limits and the possible introduction of traffic calming measures that may provide a disincentive to use roads through the SDNP to gain access to and from the THV development.

We welcome and support opportunities to improve existing, and establish new, links between THV and the SDNP.

4.58 to 4.65 **Public Realm and Blue Green Infrastructure** – We note the issues surrounding delivery of the public realm. We have no comments at this stage of the consultation.

Food Growing – Noted.

SNCI and other Large Open Spaces – We are pleased to note that the status of the SNCI is to be maintained and it is not included in the THV development site. We believe the opportunity must be taken to both enhance the existing SNCI and extend the designation where, due to the topography, it is not considered practicable to develop. Other “green” areas should be incorporated to create a new “Urban Fringe” to soften the impact. The consideration should be given to a buffer zone between the THV site and the SDNP.

5. Development Phasing and Infrastructure Delivery

Noted. We have no comments at this stage.

Summary

The THV site is highly visible from the SDNP and its development has the potential to be extremely damaging to views in and out. It is therefore crucial that any development at THV is landscape-led. An effective transport and travel plan is essential to minimise the impact from increased traffic including how car movement across the SDNP can be mitigated. Opportunity should be taken to re-establish links for walkers, cyclists and equestrians from THV site to the SDNP which were disrupted when the AONB was severed by the A27 Brighton bypass, and also to re-designate areas that cannot be developed back to Urban Fringe.

Jess Price on behalf of the **Sussex Wildlife Trust**

The following comments are made on behalf of the Sussex Wildlife Trust in response to the Draft Toad's Hole Valley Supplementary Planning Document (SPD).

Given the challenges and sensitivities of this site, the Sussex Wildlife Trust welcomes the creation of a detailed SPD. This will help ensure that the development of this site lives up to the City Plan's vision to become a One Planet, Zero Carbon City.

General

The Toad's Hole Valley Site of Nature Conservation Importance (SNCI) forms the western boundary of the site and is referred to throughout the SPD. There has been a move nationally to refer to all locally designated sites as Local Wildlife Sites (LWS) rather than Sites of Nature Conservation Importance. We recommend that BHCC adopts this term. It would be more consistent with neighbouring authorities' plans and in line with Defra's reporting process.

Section 4 – Development Response

The Trust strongly supports the creation of a masterplan to cover the whole site, including the LWS (paragraph 4.2). However this plan must be informed by up-to-date evidence on the current state of the site. Any development proposal must demonstrate that biodiversity gains are a fundamental part of the masterplan, rather than 'slotting in' ecological mitigation once the layout and design have already been decided.

Ecological surveys should be carried out prior to the formation of a masterplan, to ensure that biodiversity is embedded into the development. We support the indicative list of assessments in paragraph 4.6, however these should inform the masterplan rather than just the planning application.

This would be more in line with paragraph 4.48 of the draft SPD. We therefore recommend that paragraph 4.5 is amended as follows:

'Given the sensitive nature of the site in relation to the setting of the SDNP and LWS a range of studies and impact assessments will be needed to support pre-application discussions, the creation of a masterplan and the submission of planning/reserved matters applications.'

We also note that there is no reference in the draft SPD to the ecosystem services that the site currently delivers. Given that 'every opportunity should be taken to reduce the ecological footprint of the development' (para 4.48), we recommend that the SPD includes a requirement to consider the utilisation and delivery of ecosystem services at Toad's Hole Valley. This could be included in section 4.6 of the draft SPD:

'Ecology and Tree surveys to provide benchmark data against which the delivery of ecosystem services and net gains in biodiversity can be monitored'.

We take this opportunity to highlight to BHCC that the Sussex Biodiversity Record Centre is now able to run a programme called Ecoserve. This programme uses biodiversity and habitat data to look at the ecosystems services currently provided by an area's natural capital. It also assesses where the demand for those services are in relation to population. We suggest that this might be a useful evidence base for BHCC to consider as an aid to demonstrating how development of THV could make a contribution or enhancement to the continued delivery of those services on the site.

Paragraph 4.15 suggests that impacts on the SNCI/LWS need to be mitigated, however the development should first seek to avoid impacts as per the mitigation hierarchy (NPPF para 118). The last sentence in this paragraph should be amended to:

'The valley floor is located along the LWS border and impact upon it needs to be considered. Any adverse impacts should be avoided, if this is not possible then mitigated'.

The Sussex Wildlife Trust welcomes the requirements in paragraph 4.48 and strongly supports its inclusion in the SPD.

We are concerned about the support for improved pedestrian and cycle access to Toad's Hole Valley LWS, particularly in paragraph 4.56. Whilst we fully support increased connections between people and wildlife, it must be noted that Local Wildlife Sites are designated for their biodiversity value. The priority should be to undertake a thorough suite of appropriate ecological surveys to inform a management plan for the LWS. Once these parameters are established, it will then be possible to identify the special features/areas of the LWS. These can then inform the appropriate level of access and where those access points should be located. The LWS must be brought into long term positive conservation management, with public access as a secondary benefit if appropriate.

The Trust strongly supports the aim to create open spaces which are 'rich in biodiversity, accessible, usable and that help reduce vulnerability to a changing climate', however the SPD should acknowledge that private outdoor space can also contribute to the green infrastructure network. We recommend that the SPD encourages the consideration of the design, location and orientation of private outdoor space to ensure that it contributes to the wider ecological network, with gardens working collectively for biodiversity as green corridors through and around the development. Issues such as the use of non-native invasive species and predation risks from domestic cats should be considered when designing the layout of gardens.

If you have any questions regarding our response we would be happy to discuss them with you.

1.4 Individuals

I have reviewed the boards at Hove Town Hall and as invited have made some commentary below. I am a relatively close resident and though in favour of developing the land I feel it should be done so to reflect the surrounding areas rather than trying to produce ridiculously high densities of

living. The area should be as Hangleton to the West and Patcham/Hollingbury to the East in my opinion. High density living should be in areas with adequate infrastructure.

My comments were as follows.

1. Should a minimum number of houses with gardens be specified to be in keeping with the surrounding area. The current proposal seems likely to encourage highrise developments and doesn't give any guarantees any houses will be built.
2. With the council currently developing their own housing shouldn't the code requirements be in line with their specification instead of an enhanced one to encourage the development rather than smother it with onerous baggage.
3. Regarding the councils current space requirements couldn't the local authority put the enhanced space requirements in place to give the developments a more pleasant feel.
4. Should there be something in place to ensure the proposed green spaces don't end up on the low value land alongside the A27 and the main road for obvious noise and pollution reasons.
5. Assuming the density is a government requirement will it not be vastly out of keeping with the surrounding area? 2 four storey blocks within a vast swath of 2 storey housing with gardens shouldn't give a precedent for solely high rise development adjacent.
6. Should there not be some wriggle room on the density proposed given that a percentage of the land would be considered undevelopable especially as piling on the aquifer may not be possible?
7. There is suggestion of a park and ride scheme? Given the density any parking is likely to be used up, unless solely allocated for that use? Shouldn't a new bus route have to be negotiated as part of the development, perhaps some subsidy for a period?
8. The proposal is not clear as to which of the space categories 'roads and paths' fall under?
9. Should the noise mitigation levels for the A27 be set at this stage to give the developer something to aim at?
10. With the development appearing to be steered to highrise and flats should some guidance be given on whether planning want the development to merge into the surround developments or stand alone?
11. I am confused about the high target of Housing Association units, 40% of the development? 2 things. 1. Is Brighton & Hove able to fill that sort of availability given the developer is under no obligation to stage release units? 2 does this send the right message out to young working families living in 1 bedroom flats in town looking to improve their children's living space? Also should part of that 40% be set aside for those not necessarily top of the housing list to foster a better mix, my apologies if am showing ignorance of the system.
12. Primary school places are not discussed at all in this document, should there be some condition or section 106 strategy if the development puts undue pressure on places?

This is Brighton & Hove, nothing on this scale has been built in my lifetime and you have a chance to create a genuinely nice place for everyone to live. No pressure.

I attended the exhibition at St Peter's Church, Holmes Avenue on the 18th March.

The development of Toads Hole Valley offers a once and for all opportunity to realign or divert the A2038 King George VI Avenue from the Goldstone Crescent junction to the A27 and I was surprised that no reference was made in the consultation to this issue. This stretch of road has been the site of many accidents, some of them serious and with at least one fatality due to combination of excessive speed, high traffic densities, the combination of a steep gradient, tight bends and opposite or inadequate super-elevation.

Evidence of the frequency of collisions on this stretch of road can be seen in the different ages of the boarded fence panels to the properties towards the lower part of the hill where drivers lose control and vehicles run into people's back gardens. Head-on collisions have occurred on the bend at the bottom of the hill, for the same reasons.

I would suggest that it imperative that King George VI Avenue is either realigned on a less steeply graded route, for example as outlined in an earlier proposal at the base of the embankment to the A27, where fewer and more gentle bends can be combined with roundabouts reducing vehicle

speeds and the risk of serious accidents occurring. Until the road safety issues are resolved, I suggest that there should be question of additional road junctions being planned, particularly to the Toads Hole development.

We wish to object strongly about the prospect of the development at Toads Hole Valley. We have lived at 11 Windsor Close (BN3 6WQ) for 45 years and our garden backs onto King George VI Avenue (KGVIA). Increasingly over the years we can see the pollution from increased traffic resulting daily in filth on the washing line and our desire not to grow vegetables at the top of the garden as we used to do many years ago with our children.

Cars have come through our fence sporadically as they have with our neighbours at numbers 9 and 10 which we suspect is due to the camber and the total ignoring of the 30 mph speed limit half way down the hill. We estimate over 90% of vehicles are travelling faster than 30 mph and you can see the result as per on Tuesday April 18 when a car overturned and an air ambulance was needed.

What so distresses us is not the buildings (we are not NIMBYs!) but the change from the original document issued in August 2012 where one of the proposals was to reroute KGVIA to run alongside the bypass thus keeping most of the pollution away from so many of the houses. The new development (and the development on the roundabout at the top of KGVIA) will result in a huge increase in traffic causing illegal levels of pollution. Already this is bad enough at school and work times (most surveys are conducted at 11.00 in the morning on a quiet summer's day during school holidays rather than at 8.30 in the morning on a busy winter's work day). We read constantly about the perils of fumes, particularly diesel fumes, The government is at fault there having encouraged people, including us, to buy diesels only now to be told that they cause more pollution.

This plan has been under discussion now for five years and yet the recent manned exhibition at St Peter's Church was a complete waste of time. The officials there could provide no details on roads, housing etc only vague generalities. It was probably done to whet the appetite of developers. In earlier exhibitions, we asked the woman on the traffic section (of the 'meet the public to air views') concerning the infrastructure. She told us that 'they didn't have the money for a full traffic survey'. Our answer was 'if they didn't have that how will they have money to redirect the roads etc'. It looks like we're in for a similar situation to the Newhaven/Peacehaven into Brighton levels of snarl up traffic and pollution but here, being further away from the sea, pollution levels will not so easily be dissipated - we're in a valley! Our daughter lives is Queen Victoria Avenue (BN3 6XB) and our grandchildren walk to Aldrington School every morning breathing very polluted air on some mornings in November and December 2016 and January 2017. We're sure you wouldn't want that for your grandchildren.

We feel as do many others that we have no voice and are banging our heads against the brick wall of large powerful rich corporations in hand with Government officials and Council bosses being 'yes' men with no moral backbone because of their own desire to 'go up the ladder of success and power'. Power corrupts. Let's have some honesty in all this and show that you don't have a 'couldn't care less' attitude and muster with your colleagues a voice against such madness. Are you a 'yes' man or do you care? The latter we hope.

I visited the exhibition about Toads Hole Valley Development at Hangleton Community centre. Whilst recognising the government requires councils to provide housing I am against the Toads Hole Development per se and wish to make the following observations.

As I understand it, all development of the site, (Brighton and Hove Albion for example) has been prevented because it was agreed that access could not occur either on to the A27 by-pass or on to King George VI Avenue. Has this in some way changed? If it were possible for the council to compulsorily purchase Court Farm at the top of King George VI Avenue, then I think there would be possibilities for access from any development straight on to the round about.

Whilst the plans give consideration to the infrastructure, the idea of including a secondary school in the development which will have maybe 1500- 2000 places seems strange. Whatever the aspirations that people will walk or cycle to this school, the way secondary selection is made, it is unlikely that all places will be filled by inhabitants of this development meaning some pupils may well end up travelling from the other side of town. Having seen first hand the chaos parental drop off causes at both Blatchington Mill and Hove Park, I do not think enough thought has been given

to how surrounding roads will cope with the inevitable increase in traffic that another secondary school will bring. Even if initially the first residents of the estate work in the work units and / or have children who go to the school on site, there is no guarantee that future residents will have school age children or choose to work in the vicinity, so again the traffic flow will increase. Plans include shops and a business park. Having seen the chaos caused at The Grenadier by the opening of one small Tesco Express and the large delivery lorries that drive round the residential streets in a circuit, sometimes queuing there in order to make deliveries, I am concerned of the potential 'knock-on-effect' any development of Toads Hole would have on the surrounding roads.

By-passes, as this proves, just become an opportunity for infilling and then eventually the requirement for another by-pass. Steyning, Horsham and Haywards Heath have now all seen development up to their by-passes. Indeed Hangleton Road is itself an early by-pass.

Instead of yet more student accommodation land at Preston Barracks, to name but one place, could have been used to solve all the areas housing problems and met the council's obligations.

Regarding the consultation 2-3 bedroom houses thinking of 1st time buyers.

This document does not address the serious challenges posed by the site. This should be a chance to create an attractive new neighbourhood sensitive to its location and sympathetic to the neighbouring areas of Goldstone Valley and Hangleton and Knoll, but it fails dismally. The vision should be for a garden suburb with densities appropriate to the adjacent neighbourhoods, not three times higher.

One of the major problems associated with the site is the fact that it is isolated by the A27, King V1 Avenue and the steep bank of the SNCI. King George V1 Avenue is a very steep, very busy, dangerous road. Originally there was to be a parallel road option through the site near the A27 allowing better integration between Toads Hole Valley and the Goldstone Valley. This was welcomed as making the whole area much safer but this seems to have gone and the only recommendations are for central reservations and crossing points across King George V1 Avenue. This is going to make the road even more dangerous. There is also no detail about how the junction of King George V1 Avenue and Goldstone Crescent could be improved or how the entrance into Toads Hole Valley might affect this already very dangerous junction.

Parking is another great concern. The proposed number of parking spaces in Toads Hole Valley is wholly insufficient and is likely to lead to more parking in the Goldstone Valley which already suffers problems due to the lack of parking facilities for the office developments at Hove Park. Residents will undoubtedly have cars because the bus service to Goldstone Crescent is minimal. There is a very basic half hourly service during the day and a virtually non-existent service at evenings and weekends.

Toads Hole Valley is a downland landscape and the strategic views should be protected. There are no recommendations to protect the splendid sea views that are a feature of the area. The high rise buildings proposed for the valley floor would obscure the contours of the landscape and block the sea views.

There needs to be a comprehensive medical centre and a dentists surgery on the site. In Hove Park Ward we have neither. We also have no community facilities so this should be an essential requirement.

It is important that the SNCI area is preserved and enhanced as it provides a rich habitat for wild life. The trees here should be protected and many more planted across the whole site.

The vision of an urbanised neighbourhood like the New England Quarter is not appropriate in this location. This is a downland site on the urban fringe and we need to take advantage of the valley's natural assets not destroy them.

One of our main concerns is the volume of traffic 700 homes will generate. Are plans in hand for coping with this? New roads being created?

At the previous consultation we voiced our concerns about the traffic and potential gridlock because of the extra traffic. We pointed out that the rearrangement of traffic lights at the Sackville Road junction had resulted in the lefthand lane being void of traffic a lot of the time whereas the traffic going straight ahead from Nevill Road along Sackville Road had long queues. This resulted

from the previous arrangement of traffic going straight ahead being merged into one lane instead of the two previously available. Increased traffic from Waitrose also added to the volume of traffic using this junction so merging the traffic into one lane was a big mistake. Could this be rectified?

I think the new buildings proposed will be out of character with its surroundings/existing neighbourhoods

Much denser than Goldstone Valley - too many people for the proposed space

King George IV Avenue already a dangerous road, increased number of cars will make this significantly worse

Turning out of Nevill Road and Goldstone Crescent onto King George IV Avenue current status:

- the traffic builds up even at quiet times meaning you can be queuing for a long time
- Dangerous turning onto main road

Increased traffic on King George IV Avenue will be generated by the new development - it's already bad, this is just going to exacerbate the traffic problem

Traffic impact could cause delays and queues on Dyke Road Roundabout and the A27 (coming off the A27 from the west traffic is already bad at this junction)

During Brighton & Hove football matches at Falmer

- Parking near the top of Goldstone Valley is difficult currently as lots of fans park there to get park & ride bus, this makes it hard for people that live there to park near their house
- I've seen buses having to reverse back down the road as people parking for football is so bad it blocks the bus route (road)

- This will only get worse as more people live in the area and an overspill effect is caused

Parking - only 1.5 spaces per dwelling will force people to park outside of area and could have a negative impact on off road parking on Goldstone Valley

The impact of increased traffic - environment on local areas such as Three Cornered Copse and green ridge - increased footfall and damage to the local ecosystem

Where are the entrances/exits via road proposed to be?

My concerns are -

- the importance of attractive architecture - some of your examples are just square blocks (Anston House on Preston Road is a disaster)
 - insist on the policy of 40% social housing
-

I read with concern that no realignment is proposed for King George VI Avenue which is a steep and dangerous road and the main access road from the A27 into West Hove. The Council's proposed street facing frontages and commercial uses adjacent to the road and the proposed central reservations and crossing points to change driver perceptions and behaviours will not be practical improvements in my opinion.

The proposed heavy development will create a neighbourhood out of character with its surroundings, much denser and more urban than the Goldstone Valley, Hangleton or West Blatchington.

The likelihood of more traffic on the King George VI Avenue and surrounding roads caused by the proposed new dwellings and businesses also concerns me greatly. As a user of public transport I feel for the passengers on the 5b or 21 who may no longer be able to journey into Toads Hall Valley.

The provision of 50% of houses being 3+ bedrooms? I think that's far too high – especially with the student population and the younger generation who will not be able to afford these properties. Meaning from the start, just 50% of the proposed housing will be within a reasonable price range.

I'm disappointed that there have been no access arrangements.

Having spent much time studying the SPD in respect of Toads Hole Valley and attending the exhibition at St. Peter's Church I feel justified in forwarding my impressions in respect of the proposed development.

I understand and appreciate the need for additional homes both locally and nationally but also feel

it is incumbent upon the planners and developers that what is envisaged or undertaken should be appropriate to the area.

The number of properties indicates that the density of development will be significantly higher than that currently prevailing in the area. If 50%+ of the properties are 3bedroom or larger then restricting parking to a single space in this day and age when teenage children as well as parents are likely to be vehicle owners fails to address need.

The likelihood if this is adhered to is overspill for parking into the surrounding community which is unfair to established residents.

The SPD refers to shops, doctors surgery as well as community facilities and café. All of these will require parking for staff and visitors and not all of these will be able to use bus transport even if this has been adequately provided which in itself is questionable. This difficulty will be further exacerbated with the proposed commercial inclusions.

One aspect which is especially missing from the SPD is the means by which adequate and safe access to or egress from the site will be available. King George VI is already a very busy and dangerous environment and to potentially add maybe 1000 vehicles a day is a worrying prospect.

Protection of the SNCI site and the communities views across this area to the Downs are also important considerations.

In summation the SPD gives the impression that the council prerogative is purely to push as much as possible into the area regardless of consequence and with scant regard for the standards currently exhibited in the adjacent developments. As stated initially the needs are recognized but please ensure the development and developers is appropriate to the local standard.

Yesterday, I visited the the display, in St Peter's Church, West Blatchington, concerning the proposed development in Toads Hole Valley.

While there, I spoke at some length to one of your excellent team on duty, who suggested that I send my thoughts to you.

As a local resident and a member of the Goldstone Valley Residents Association, who has fought off previous proposals for this site, I do think that it is a good idea, especially as this land was not taken into the South Downs National Park and also because there is no more spare land in the City, for houses, except for many empty buildings which are left derelict for some reason known only to yourselves.

This said, I would like to make two proposals for the new housing on this site, both concerning car parking.

For some unknown reason, our Country does not go in for building underground car parking: despite the fact that our Country is so overcrowded. We continue to build houses with front gardens (Which no one uses) instead of using them to park cars off the road. Better still is to build car parks under the proposed houses which would also give space for utility rooms.

Our local roads are becoming more and more difficult to negotiate, especially for buses. The problem is not just cars, but vans, lorries and 'city tractors'. My fear is that if you build the usual kind of houses on this site, the area will become impossible concerning car parking.

Finally, I am intrigued about the proposals concerning the road system around this area which at present is a death trap between Goldstone Valley and King George VI Avenue. This despite many efforts and ideas by the Residents Association.

As a driver who frequently makes the difficult exit from Goldstone Crescent onto and up King George Fifth Avenue, I am extremely perturbed that appears to be no plan to improve this access to West Hove, which will inevitably suffer as a result of both the construction and eventual habitation of the area.

I am not a road engineer, but consider that both KGFA and access from surrounding roads should be improved as part of this development.

Why are you planning to build over green space? Why can you not turn it into something the residents can use for recreation, fitness, education? Why are you trying to add an neighbourhood that is completely out of character with the area?

Traffic is bad enough around King George VI Avenue and adding more properties with more vehicles will create a grid-lock. You are saying car share, public transport is all well and good but people use their cars!

This will affect the parking around Goldstone which already getting worse by the week. What would be great is if you actually think of the residents who live in and around the area and how it will have a negative impact on our lives and try and do something useful and create something in the space that we can all benefit from.

I think the architecture of the new houses at Toad Hole Valley would be massively important. Architecture that blends in with nature, with curves rather than right angles, in keeping with the environment - would make a large contribution to the character of the place and the happiness of people living there. Use of environmentally-friendly materials is important too. Please, no more red bricks like in Hangleton!

This is also an opportunity to extend bus routes near the site. How about a bus that goes along the bypass and down London Road or Hollingbury? At the moment all bus journeys have to go into town and out again.

1.5 Individuals who supported Campaign to Save Toad's Hole Valley representation

Dear planning, I endorse the campaigns view reflected below.

I wish to register my support for the Campaign to Save Toads Hole Valley's representations.

This is to endorse the response of the Campaign to Save Toads Hole Valley to the planning document for the area.

The observations are clearly made by people well aware of the site and the city's problems re: housing. I fully support the line they are taking.

this is to confirm that I agree with the following changes.

I am a member of the Campaign to Save Toads Hole Valley and I refer to the Campaign's response to the Council's draft SPD for Toads Hole Valley. Whilst I generally endorse the Campaign's representations, there is one key area where I have a different view. This is in connection with the future of King George VI Avenue; the view of the Campaign is that this should be rerouted close to the A27. My strong view is that King George VI Avenue should not be rerouted for several reasons and I would be grateful if you would take this view into account in your deliberations

The new recommendations by the Campaign to Save Toad's Hole Valley are to be commended, especially if you are a resident in West Hove. To reroute George VI is a no brainer. To make this development a garden suburb would make us proud of your council, for a change. Brighton has declined immeasurably. Please don't ruin Hove as well. Make this new development, although misplaced, a place to be admired nationwide.

Dear Hazel, I am a long term resident of Goldstone Court....over 40 years. I have enjoyed the open views over the Valley. I agree with all your comments in your latest correspondence. Although I am not in U.K. right now, I follow all the news through my sister, also a resident adjacent to the area.

Thank you for your continued efforts, to have a successful outcome.

I fully support the points made by the Campaign to Save Toads Hole Valley. They have clearly taken a good deal of time, trouble and expert opinion to analyse all aspects of the development of this difficult site. To treat this area as flat land with easy access would be to make a big mistake.

In particular I support their wish to see much more care taken with planning the road access. To just push new traffic out into King George VI Avenue without major re-alignment will be dangerous and I support a new road going around the edge of the newly developed site. I do not wish to see over development which will result in 3 times the density of population as in neighbouring

Goldstone Valley.

Please pay much more attention to the points made by The Campaign. They seem to have the interests of the whole neighbourhood more at heart than do 'official planners' who just want to squeeze in the maximum possible. This is a difficult site, otherwise the owners would have developed it years ago. It deserves quality planning and the support of those of us who will have to live near it.

Attachment endorsing the campaign for formal inclusion regarding consultation of THV.

I fully support the representations made by the Campaign to Save Toads Hole Valley in order to ensure that the development is undertaken sensitively so as not to degrade the local area. In my view, it is imperative to get the road scheme correct to avoid gridlock and total mayhem.

I fully endorse the latest proposals put forward by the Campaign to Save Toads Hole Valley.

We write to totally endorse the "STHV" comments on the draft supplementary planning document to the council on Toads Hole Valley.

The STHV document is well thought out, detailed and most of all offers a sensible solution to all of the issues surrounding the development.

We endorse the Save Toads Hole Valley campaign's representations.

We do not consider that this has been investigated fully & that the development will have a disastrous affect on the surrounding roads, which are already dangerous.

I endorse the representations from the Save Toads Hole Valley campaigners.

I should like to endorse the representations of the Campaign to Save Toads Hole Valley, coupling this with a vote of thanks to Hazel McKay.

I was disappointed by the Council's Supplementary Planning Document, which appeared to me to be long on buzzwords, the import of many of which seemed rather obscure to me; and short on the realistic ambition to create something of which we might still be justifiably proud in 75 years' time.

To me, the key points that emerge from the Council's Supplementary Planning Document are that:

- The site will be too densely populated;
- The height of some of the buildings will be too great, and out of keeping with their surroundings;
- The infrastructure will prove to be inadequate.

If I might expand upon that last point, the idea that restricting the provision for vehicles will reduce vehicle ownership is— not to put too fine a point on it — laughable. I understand that this idea has been tried elsewhere, and that the most that it has achieved is to create problems elsewhere, as residents parked their vehicles in neighbouring areas. Many households have more than one vehicle, and many tradesmen will take their own or their employer's van home with them. You can improve public transport all you like, but many people will still not be able – or want – to dispense with their cars or vans. Therefore, the road infrastructure will need to allow free access to the development while accommodating the vehicles that the residents are likely to use.

Fast forward twenty years or so to a point where electric vehicles are a practical option, where they can be charged quickly using electricity from renewable sources, and where batteries can not only hold a substantial charge but can also be manufactured and disposed of without causing harm to the environment. The only prejudice against privately-owned vehicles would be that they caused congestion on the roads; and, in my experience, no-one participates in a traffic jam if they can avoid it. If, in twenty years' time, someone were to ask why the proposed development had insufficient parking space, what would the answer be? 'To reduce atmospheric pollution' would no longer be an answer: and the proposed development will likely be around for much longer than the internal combustion engine.

They say that generals are always fighting the last war; that is to say, that they are always doing now what they should have done then. To me, the proposed development seeks – albeit inadequately – to address the problems that we should have foreseen thirty years ago; whereas it should be attempting to address the problems that we can foresee now. For example, the infrastructure could include provision for the future installation of charging points for electric vehicles. Those charging points would not have to be installed now, but it would be much easier to install them later if they had been provided for now. I daresay that there are other examples where the proposed development could, to an extent, be ‘future-proofed’. Even though we do not know the detail of what will be possible in the future, we could still build a degree of flexibility into the bigger picture.

I am writing to inform you of my support for the submission recently made to you by The Campaign to Save Toads Hole Valley.

I am not going to deal with detail but a particular concern is your current intention to leave the alignment of King George VI Avenue as it is.

I am writing as a resident of Goldstone Valley regarding the development of Toads Hole Valley.

I wish to endorse the proposals made by the Save Toads Hole Valley Campaign in their recently submitted representation.

Just to say that I endorse the Campaign's representations.

2. Full transcript of responses received via the council’s Consultation Portal

1.1 Statutory consultees

Sport England

The THV SPD does clearly incorporate some excellent aspirations (such as a focus on reducing car dependency and an accessible and legible network of routes) which will contribute to keeping people active and these are welcomed - however, in order to give it our full support we would request it go even further by making some reference to Sport England's Active Design Guidance, below, in order that applicants might consider it when making planning applications. This is an excellent opportunity to ensure places are designed with active design in mind from the outset. Sport England believes that being active should be an intrinsic part of everyone’s daily life “ and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. This guidance sets out the Ten Principles of Active Design. The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often. The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design. <http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design>

1.2 Organisations/Groups

Becky Reynolds on behalf of **Bricycles and Cycling UK Brighton and Hove**

We welcome the "Improved public transport and network of cycle and pedestrian links within and beyond the development site that provides better connections with surrounding neighbourhoods and communities employment opportunities, the city centre and the seafront, public services, the SDNP, SNCI and other open spaces; and measures to overcome the existing physical severance caused by the A27 and King George VI Avenue." The map provided on page 4 is of doubtful value, particularly with regard to cycling. There is no key/legend to explain the dotted lines etc. It is very important to provide access to the area north of the A27 without expecting cyclists to take long detours in the wrong direction or cycle through unlit deserted areas. Maintenance of cycle routes is also important i.e. collection of broken glass, cutting back vegetation and ensuring that dogs are under control. We note the statement: "any potential harmful effects on the environment as a result of the development are mitigated." We are very concerned about the effect on air quality of any increase in road traffic as well as any damage to the natural environment. Mitigation is not actually possible in some instances, and therefore deterioration in air quality and some other environmental degradation will need to be avoided altogether.

What is meant by: "The road is on a fairly steep incline which influences driver behaviour." - do you mean speeding? Please clarify.

One Planet/Biosphere policies are good.

We note that a "masterplan" and "design code" is being recommended to provide information about: "means of access for all routes within the site and the way these link up with the public transport network and other roads and pedestrian and cycle routes outside the site;" and that a "Transport Assessment (TA) including an appropriate level of analysis and mitigation for the scale of development that addresses trip generation and movement by all forms of transport and other transport/travel-related issues such as road safety." We are unsure how members of the public can input into these documents or comment on them. Will they be available for consultation?

It is essential to have a network of open spaces and routes connecting destinations within the THV site and linking up with nearby places. Please see our section on Transport and Travel.

Neighbourhood centres are safer and more vibrant when motor vehicles are restrained - also, there is more space.

We welcome the "close access to public transport". There needs to be adequate cycle parking including secure, covered parking. Houses/flats also need to be designed to enable people to bring bikes indoors without huge difficulty and without blocking access or contravening fire regulations. Integrated parking/storage arrangements for cycles (and other items) are very convenient for people and would assist bike use.

Some of these design aspirations are quite unclear e.g. "car parking in a manner that ensures that the roads leading to it are designed so as not to have the negative impacts associated with large numbers of vehicle movements; "Motor vehicles are a big negative presence in communities due to toxic emissions, collisions, noise, severance etc. and we again recommend that car free housing/offices are considered in the first instance. Also, this document needs to be phrased in plain English using short comprehensible sentences.

Safe cycle routes and walking routes to and from schools/colleges should be prioritised, and school travel plans should be required which minimise car transport. The routes should connect with the wider cycling/walking network. Cycling/Walking to school should be encouraged due to its health benefits. Bikeability training should be made available to children and parents.

Pedestrian / cycle links to the SDNP and elsewhere are essential. Business travel plans should be required to ensure that the use of motor vehicles is minimised. We welcome the inclusion of a "community meeting place". The availability of a free or reasonably priced venue enables community events to be organised. This reduces social isolation and assists the development of a local identity. We would like to ensure that there will be space for cycle training to take place and a venue for bike maintenance in order to encourage cycle use.

We support City Plan policy DA7 of any development being an exemplar of sustainable development and demonstrate that the city's UNESCO Biosphere Reserve objectives can be successfully integrated. In 4.48 we support "effective, accessible and sustainable transport links (cycle and pedestrian routes and public transport)". The policy framework sounds good. We hope to see implementation to this standard.

We support the aim of a fully connected new neighbourhood with sustainable transport linkages within and across the site. We strongly support sustainable transport and tough measures to bring about road traffic reduction and vehicle emission reduction. It is essential that pedestrians and cyclists are given priority over motor vehicles, particularly at junctions and that adequate crossings are provided. Pedestrians and cyclists should not be expected to give way to motor vehicles.

Toads Hole Valley provides an excellent opportunity for Car Free Housing which should be seized so that the environment is cleaner, safer and more space is available for people rather than cars. Car Free Housing is included in SPD14 Parking Standards. We oppose Park and Ride on this site. It is clear that vehicle emissions and air quality are serious health issues needing positive action. Park and Ride will generate traffic and increase emissions. The Community Infrastructure Levy / Section 106 funding could be used to fund several cycling links. Toads Hole Valley needs to link to Route 82 which passes to the western side of the site. The approach of Route 82 from the south needs to also be improved e.g. by narrowing the wide junction as the route crosses Hangleton Road, ensuring continuous signage, ensuring adequate separation from traffic on narrow/busy roads and speed enforcement where traffic speed might intimidate cyclists. There need to be direct and improved cycling links to the City including one across King George VI Avenue (A2038) to join the A2033 Nevill Road (Route 82) to Nevill Playing Fields and Hove Park and the Old Shoreham Road cycling facility. The cycling/walking links from Toads Hole Valley to the Dyke Railway Trail (Route 82) needs continual good maintenance in the off road sections to remain viable and attractive i.e. removing rubbish, dog excrement and cutting back vegetation. There needs to be linkage from Toads Hole Valley to Dyke Road / Dyke Road Avenue. The advisory cycle lane along Dyke Road / Dyke Road Avenue needs a complete redesign as it is currently useless. It is constantly obstructed and absurdly narrow at points. When there are road works (as there are now) signs are put in place saying "Cycle lane closed" with no alternative and no instructions to drivers to moderate their speed, give way to cyclists etc. This route, which is well used by cyclists needs to be improved so that riders can more safely be given passage across the two roundabouts at the junction of Dyke Road Avenue / Devils Dyke Road / Mill Road / King George VI Avenue (A2038) and the A27. We suggest constructing the type of roundabout which is being built in Cambridgeshire with the assistance of the Dutch Cycling Embassy. It has tight geometry to reduce vehicle speeds and the provision of a continuous cycle lane accessible at all arms. Traffic speed reduction would assist pedestrian/cyclist priority. We support the proposed tunnel under the A27 from Toads Hole Valley to connect with Devil's Dyke Road and to the cycle track which goes to Devil's Dyke. From here access can be made to Saddlescombe, Newtimber (link to NCN Route 20) and Poynings There should also be access across King George VI Avenue, avoiding the two roundabouts, so that cyclists can join the bridleway going north east along Mill Road, then use the footbridge over the A27 to pick up NCN Route 20 near Waterhall going north next to the A23 and then to Wayfield Farm, Pyecombe and beyond. We would like to see a wide range of cycle routes in and out of Toads Hole Valley, including a convenient route to Withdean for the leisure and sports facilities. Any new cycling/walking infrastructure should be built to the highest quality best practice standards, using design standards such as London Cycling Design Standards. Dedicated cycling facilities are preferable to shared walking/cycling facilities. We do not want to see odd street design that includes unexpected kerbs or bollards which cause hazard to cyclists and pedestrians. Traffic calming should not cause problems for cycling/walking. Surfaces for cycling should be smooth. Mentioned elsewhere, we do not want to see a repeat of the poor standard of provision for cycling and walking as demonstrated in the "Greenway" cycle way at the back of Brighton Station. Travel Plans should be requested from businesses, schools etc. and checked for measures to promote sustainable transport. The second paragraph under "Pollution and Emissions" (Page 25) is overlong and needs re-writing for clarity. If HGVs are causing noise and toxic emissions close to human habitation, they can be banned from travelling uphill on the A2038 King George VI Avenue. An alternative route can be found e.g. via Benfield area to the west. It is possible that some of this site could be used for a mountain bike/skateboard park, making use of the naturally steep contours. We support "4.60 Delivering effective links through and between the school playing field, food growing space, public open space and to the National Park and South Downs Way." "In 4.62 The design of the network of paths, roads and open spaces" we would like to see reference to best practice, high quality, dedicated safe cycling infrastructure, not inadequate shared space arrangements. Pedestrian and cycle routes should have priority over motor vehicle movement and parking and not give way at every junction. There should be home zone arrangements where motor vehicles are either excluded or are allowed as 'a guest' with very low speed limits. We have recently had to complain about the provision of the "Greenway" cycleway at the back of Brighton Station. This is a route which was provided on a slope by a private developer. The provision is appalling and sub-standard. We would not want to see a repeat of anything along those lines at Toads Hole Valley. Infrastructure for cycling and walking must be prioritised in the development and not left as a late

add-on. Widths for cycling and walking must be adequate and not trimmed down as the development is built.

We would like to see the road safety improvements and improved sustainable transport links to the area described in DA7 come into reality. Cycling can make a huge contribution to One Planet living and a low carbon economy and reducing emissions relevant to the Spatial Strategy, CP7 Infrastructure and developer contributions and CP9 Sustainable Transport and Health and Happiness, particularly SA6 Sustainable Neighbourhoods, CP12 Urban Design, CP13 Public Streets and Places, CP16 Open Space, CP17 Sports Provision and CP18 Healthy City. Cycling is a benign activity which supports aims of Brighton & Lewes Downs Biosphere. Cycle access is supported by the SDNPA. We want to see BREEAM standards fully met for new homes and transport links. We support the suggestion that there could be a National Park Gateway for pedestrians and cyclists via a tunnel under the A27 and a link to the old railway line up to Devil's Dyke (Route 82) and the South Downs Way.

Brighton & Hove Economic Partnership

Agree

I support building of much needed new homes.

Office: I support this development.

Education: I support this development.

Comm + retail: I support this development.

Environment: Project is environmentally sensitive.

Travel considerations have been properly addressed.

Public realm: I support the development.

Dev phasing: I support the development.

The Brighton & Hove Economic Partnership (BHEP) broadly support the aims and objectives outlined with the SPD for Toad's Hole Valley. With Reference to the City Plan Part 1 and the City's Economic Strategy 2013 " 2018 we have provided the following response as per the headings detailed within Brighton & Hove's City Council SPD consultation document.

The Brighton & Hove Economic Strategy states, "The shortage of land within the administrative boundary requires careful allocation use of every potential development site." With this in mind, the BHEP fully endorses Toad's Hole Valley as a site which can deliver several objectives as laid out in the City Plan. Most notably housing, but also schools, communal green space and business space. These will be discussed more under the headings below.

Policy DA7 Toads Hole Valley is in sync with the City's Economic Strategy Strategic objective SO2 -'To Grow quality jobs and business opportunities in higher value and low carbon sectors.' There are also overlaps with strategic objective SO1, 'To enhance Brighton & Hove's distinct destination and lifestyle offer. SO5 of the Brighton & Hove Economic Strategy 2013-18 seeks to establish a strong and influential Greater Brighton City Region. In that section of the strategy, success is explicitly outlined as: Key strategic development sites identified in the City Plan are well into the delivery phase including Toads Hole Valley, Preston Barracks and Circus Street, leading to a sharp rise in housing delivery; The Biosphere Reserve and South Downs National Park stimulate development of the City Region's offers particularly in terms of a world-class environment, tourism and food. In this context the BHEP fully supports the Planning Policy context.

The BHEP fully endorses the City Plan Part One SS1 Presumption in Favour of Sustainable Development. That section states, Planning applications that accord with the policies in [the] Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise. With additional reference to the sustainability of applications, the Economic Strategy also attests that, there is a robust and real-time evidence base supporting, monitoring and reporting on the City's key quality of life and sustainability indicators. The BHEP support the use of the Sustainability Checklist and the Authority Monitoring Report (AMR) as outlined in the city plan part 1 for this purpose.

The BHEP wholly concurs with City Plan Part 1 section CP12 (An attractive city) Urban Design. The Economic Strategy also refers to this in section SO1 enhancing Brighton & Hove's distinct destination and lifestyle offer.

Strategic Objective SO1 highlights the importance of Brighton & Hove's distinctive destination and lifestyle offer as its USP. Within this there is an inherent expectation that it is the 'place' that

makes the city. The strategy goes on to say, Quality of place therefore matters. Investment in Brighton and Hove's assets and infrastructure need to continue. This is also of particular importance in terms of transport as well as sustainable communities as outlined in SA6 of the City Plan part 1.

The City Plan Part 1 highlights the target of 13,200 homes to be built, which still doesn't meet the total future housing demand. The minimum target of 700 residential units on the THV site is welcomed, however the BHEP feels that there should be robust measures in place to ensure a good ratio of affordable housing within the housing mix. This fits well with SO4 of the Economic Strategy which seeks to tackle barriers to employment and creating employment opportunities for all by creating a mix of residents on different incomes within the development. The strategy outlines that, the constraint of housing supply also presents real barriers to labour market mobility and restricts the supply of people to take up new job opportunities, driving up the cost base for the city's workforce and holding back growth in the economy, Equally SO5 in the Economic Strategy advises the use of land for a balance of uses, with housing being one.

Strategic Objective SO2 of the Economic Strategy outlines the need to grow quality jobs and business opportunities. Specifically, the strategy seeks actions that will, ensure that there is sufficient high quality office space to meet the need identified in the City Plan and the Employment Land Study Review 2012.

The BHEP supports the mix of use proposed in this SPD.

The BHEP supports the City Plan Policy DA7 that requires that an area of 5 hectares be reserved for a six form-entry secondary school for ages 11-18, or a through school, to meet identified needs. This fits well with Economic Strategy Objective SO4 To Tackle barriers to employment. Although broadly supportive with the proposals, the Partnership would like to ask what is being done to ensure adequate Primary education provision in the area.

The BHEP supports the City Plan Policy DA7 that requires the provision of a new multi-use community facility or neighbourhood hub to include a community meeting place, a doctor's surgery, a resource promoting links with the SDNP as well as shops and cafes. This fits well with SO1 of the Economic Strategy which seeks to enhance the city's lifestyle offer.

Strategic Objective SO2 seeks, To grow quality jobs and business opportunities in higher value and low carbon sectors. • This objective attests [that the] economy is driven forward by growth in stronger sectors including specific environmental industries. • The BHEP also supports the City Plan Policy DA7 which expects the development in THV to be of an exemplar of sustainable development and demonstrate that the city's UNESCO Biosphere Reserve objectives can be successfully integrated throughout the development scheme subject to viability and deliverability' (paragraph 3.84). City Plan Policy CP8 Sustainable Buildings lists priorities and sets out minimum standards to inform development design. The BHEP is also in agreement that robust targets should also be set for: Energy generation Food growing Water use Waste management Transport links Ultra low emission vehicles Reduction of the heat island effect

The Brighton & Hove Economic Strategy outlines the need for Smart City management systems that improve the quality and delivery of public services at an affordable cost; Smart systems that reduce transport congestion, pollution and are energy efficient; Technology innovation which reduces the need to travel; The BHEP supports the City Plan Policy DA7 which, seeks the development of a fully connected new neighbourhood at THV. The site's location on the edge of the built-up area, and the physical severance caused by the steep slopes of the SNCI, the A27 and King George VI Avenue pose considerable challenges to achieving this objective. •

The BHEP supports section 4.58 of the SPD which seeks, the creation of a new neighbourhood/community to provide an opportunity to design open spaces that are rich in biodiversity, accessible, usable and that help reduce vulnerability to a changing climate. •

The BHEP supports the creation of a phasing programme to alleviate any burden on existing facilities. In addition, and as outlined in the SPD, the BHEP also supports Policy CP7 Infrastructure & Developer Contributions and the annexe Infrastructure Delivery Plan document. The BHEP further supports the types of contributions outlined below and which are listed within the SPD:

Affordable business accommodation provision and retention; Affordable housing provision including accessibility and retention; Air quality mitigation measures and/or management; Community safety measures and maintenance including appropriate lighting infrastructure; Education and learning facilities provision and/or upgrade; Employment, commercial space provision and retention; Employment training and job opportunities throughout construction phases; Health care facilities including integrated provision for other community needs, retention

or replacement, including engagement and support; Highways site-specific connectivity and upgrade to main trunk road and local corridors and sustainable transport accessibility; Phasing Plan; Project management monitoring contribution; Public Open Space including parks recreation, play space, sports and allotment provision; Public realm, environmental improvements, legibility including site specific artistic components Sustainable development high standard achievement measures and biodiversity landscape enhancement; including SNCI reinstatement and connectivity to SDNP Utilities appropriate connectivity, upgrade and management.

The Hangleton and Knoll Project

Identification of funding opportunities to fund infrastructure, Ensure Section 106 agreements, future CIL payments and other funding opportunities contribute to the delivery of a successful and viable neighbourhood. I would like to add to this that....contribute to the delivery of a successful and viable neighbourhood that becomes part of the wider existing communities

Whenever older residents talk about this site they do so in relation to the amount of flood and water table issues there are

Is there anything that pertains to health and well being needs to consider in this section?

There is a desperate need for a purpose built Doctors surgery as the wider community has a lack of capacity at existing sites to expand, This could be multi use with a community space and the unmet need in the area is for space for young people to meet - both one to one and for group work. There is a nearby children centre and community centre which caters currently for early years but no youth centre at all in the West of the City.

Youth facilities on School sites are often poorly used as YP do not want to socialise in School However the provision of sports facilities open to all would be very welcome What hampers open and community access to Schools is always about staff not facility ie there are no keyholders/safeguarding issues about others having keys etc etc

Its good to see the Doctors surgery receive more prominence here. It has been identified that it needs to be large enough to have enough consulting space for the new era of federated GP's which will require many more onsite services on offer. This would include the need for a pharmacy. Community space is often used in the evenings and care must be taken to locate it where activity does not disturb nearby residents

Building a community is about relationships and people as much as buildings and amenities and developing those require thought and investment. Thinking about how community space will be managed and maintained is vital. Its great to see the SPD recognise the need for Health and Education facilities but how will the need for a School be balanced with the opening of Kings School nearby? Have there been an updated look at pupil numbers projections in the light of this additional School in the West? (not my area of expertise) Since initial consultation a local surgery Hangleton Manor has closed making the provision of decent surgery space even more significant Did I miss play space? Will provision be located at Hangleton park and enhanced with an off site contribution? Young people have been wanting a youth centre in HK for over 30 years. Some provision to meet their needs as well as incoming community YP is vital

The current infrastructure around the THV/Goldstone Valley area does not support the current level of traffic at peak times as it is. The area will become totally grid locked once 700 homes plus businesses were built. At peak times it can take 20-30 minutes to drive 1-1.5 miles either down to the Old Shoreham Road/Goldstone crescent junction or north to the A23. There seem to be enough brown field sites around the city that would be preferable as the extra traffic would be spread around.

Kia Trainor on behalf of the Sussex Branch of the **Campaign to Protect Rural England (CPRE Sussex / CPRE Sx)**.

CPRESx works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

The Brighton and Hove City Plan Part 1 assumes less than half of Brighton and Hove's 'Objectively Assessed Need' for housing can be met and this clearly puts pressure on the surrounding countryside to meet this 'Need' (or 'Demand' to be more accurate) for new housing. For this reason, we would generally advocate higher density development within the urban environment. However, we also believe that good design is essential in shaping places where

people want to live and will enjoy living and welcome the recognition that 'The creation of a vibrant, attractive, accessible new neighbourhood that people want to live, work in and visit is the ultimate aim of City Plan Policy DA7.' The drive to achieve housing numbers should not compromise place-shaping.

This urban fringe location is a transitional buffer from the built environment to the open countryside and is sensitive in terms of hydrogeology, ecology and landscape. The site should act as a 'Gateway' to the National Park. The SDP recognises the 'challenges' of developing this site. It is important that the SPD does not become a 'wishlist' and the language of the document should reflect this. For example, it should be a requirement, not a recommendation, that a masterplan for the site including design codes, is prepared and that development proposals are subject to community consultation prior to submission to the Local Authority for approval. This would be supported by NPPF para 66 ('Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community.') This development offers many opportunities and it is essential that they are realised.

Landscape, Design and the National Park

We welcome the aspiration of high standards of sustainable design, including low and zero carbon decentralised energy and agree that it is vital that these issues are addressed by the design team from the outset. In addition to this, we feel that the SPD should incorporate more detailed guidance and context for a sensitively designed landscape-led development in the context of the setting and special qualities of the South Downs National Park. It should also give more consideration of how the scale and massing of buildings will impact on the SNCI. In our view, stronger guidance would support innovation and not hinder it.

Affordable housing is vitally important for the city and CPRE Sussex would like to see greater emphasis on the requirement that 40% of development on this greenfield site is for affordable housing. We would not like to see a repeat of examples such as the strategic site north of Horsham, where the council's affordable housing target is 35% but Liberty Property Trust have recently amended their application to provide 30% 'housing for local needs' – of this only 12.7% would be affordable rented housing, with 5.3% shared ownership units, totalling just 18%. The rest of the 30% would be made up by private rented sector housing, included at 85% of open market value (OMV), and discount market sales. more at: (

<http://www.wscountytimes.co.uk/news/politics/revisions-to-north-horsham-housing-plans-submitted-1-7874101>)

We support paras 4.22 to 4.25 of the draft SPD in terms of creating a neighbourhood centre to include community facilities and believe that this should be further developed through the Masterplan for the site to ensure that this is an attractive focal point - this may not need to be located in the lowest area of the site topographically.

Accessibility

Proposals to reconnect the City with the National Park, including use of the route of the former Dyke Road railway are welcomed. We still have concerns however about the KG VI Ave as its steep gradient makes it very difficult to adhere to the speed limits on the descent and increases air pollution and potential congestion on the ascent. Adopting physical measures such as central reservations and crossing points could exacerbate this.

Wildlife

We are very glad to see that the SNCI is not included in the developable area for the THV site and agree that its retention would provide manifold benefits with sensitive management and utilisation. The woodland bank area provides a rich habitat for wildlife. We would like to see further guidance about how the site could be managed, and any legal agreements for maintenance, linking to the Sussex Wildlife Trust, including provision of wildlife corridors and other methods to mitigate the impacts of development on wildlife once construction commences. We agree that that the steep slope along the A27 – which could act as a landscape buffer strip - and other areas of the site that may prove unsuitable to accommodate development provide opportunities to further increase biodiversity gains. Green underpasses or bridges could enable wildlife to travel across the A27 to and from the national park.

1.3 Individuals

I object to the building on this site as it is a green belt site should not be built on.

It is imperative that THV is integrated into neighbouring areas and that requires the re-routing of King George VI Avenue to run parallel and adjacent to the A27.

Trees need to be planted to create a sound barrier and better visual aspect between the A27 and THV. King George VI Ave needs to be re-routed to run parallel and adjacent to the A27 to remove barrier to neighbouring areas AND slow down traffic on what is currently a very dangerous road. It makes sense for taller buildings to be placed at the lowest point in THV to reduce overall height of the development.

It is imperative that there is a "town centre" with all the facilities 700 new families will need. This includes a GP surgery and school. We are already over subscribed in Brighton and Hove for both of these and there is no point in building homes if you do not also provide the necessary services and facilities!

A good housing mix is essential with varying levels of density.

There is no point in putting in office space unless you also invest in high speed broadband.

Working environments must be future proofed!

We already have a terrible problem of over subscribed schools so it is essential to include a suitably large school to cope with the increased population THV will bring.

Already said above... Essential to have all the facilities a new community and 700 families need including GP. True integration requires THV to become a destination as well as residential area.

Have you considered a theatre, cinema or children's centre (soft play)?

You are living in a dream world if you truly expect people to embrace car free living unless you ensure there is robust and frequent public transport. Currently Goldstone Valley is served by the 21 which only operates every 30 mins. This is NOT going to be adequate for 700 new families and workers! Do not make the mistake of thinking people will happily swap cars for bicycles. They won't. The Council need to accept that car ownership is here to stay and find ways to ensure there is suitable parking and a lack of congestion. The council spent millions on the cycle routes throughout the city and they are woefully under used.

I support the careful development of THV but worry about it becoming a ghetto and not addressing safety concerns about King George VI Avenue. As I have already said, it is imperative that King George VI Ave is re-routed to run parallel and adjacent to the A27 in order to slow down the traffic and make joining the road from Goldstone Crescent safe and viable - a roundabout would be welcome! Please please please do not just build more homes and not understand that all those new people and families will need access to facilities. We need school places (for all age groups) and GP surgeries to cater for that many new people. You also have to ensure there is an appropriate level of public transport if you want to reduce car use BUT do not think for one minute that restricting car parking will reduce car ownership. It will instead cause it to spill over into neighbouring streets causing chaos.

Are you going to have a public meeting where residents can ask questions? What about making a presentation to the Goldstone Valley Residents' Association, with a Q&A session? People I've spoken too don't feel that today was enough of an opportunity to find out what exactly is happening. Nothing beats talking to someone knowledgeable face to face.

Please don't let developers build more ugly concrete blocks. The Downs are curved and gentle, not brutal and hard-edged. Hove is becoming increasingly urbanised and it's not what people want to see. They want something that is appropriate - attractive and on a liveable scale - not grandiose! We are not an urban centre out here, we are a suburb - it's more relaxed and less frenetic. We have a lot of elderly and retired people. Most people rely on their cars and there are usually 2, 3 or even 4 cars per household. You need lots of parking and parking right outside houses. Many of the elderly are unable to walk far and they don't want to be wheeled up long paths in the biting wind and rain. Think about the disabled - they need direct access to their homes and easy access to shops and cafes. Younger people and young families want to be more central. This area is fine for older people, the retired, and families with older children - basically people who can drive themselves where they need to be. If you want to look at some attractive new South Downs architecture, look at the South Downs Heritage Centre in Hassocks - it's brilliant.

Are you planning for live/work spaces or are the offices going to attract workers in from surrounding areas, using local roads? If so, you're going to need a lot of parking, preferably underground. Not many people rely on the buses for work in my area - the fit ones do cycle (very few), but most people drive. A lot of people here are in the trades and have their own businesses - builders, plumbers, taxi drivers, dog-walkers, electricians, heating engineers, etc, and they have their own vans. Trendy digital people tend to live in the town centre because it's cooler and more social - access to bars, restaurants etc.

What about the existing wildlife that lives in THV? We have a lot of foxes and birds in this area. I'm amazed at how many species visit my small garden. Where are they all going to go? When you look at the town environment (particularly the fringes), it's not just about people. We don't have any more right than animals to live here.

I'm dreading it to be honest. I think the impact of any development is going to be massive on existing residents. I would consider leaving the area.

Please consider the rights and needs of existing residents. So much of the emphasis seems to be on the new 'community'. We seem to have been left out of considerations. Whichever way you present it, I cannot see one thing that is going to improve the quality of life for existing residents, especially in the Goldstone Valley area - those who will be most affected. That is the brutal, honest truth. We will be sacrificing what quality of life we do have left for this project. You can dress it up as an eco-development, but at the end of the day, it's more people crammed into an already densely-populated area, with limited public transport, over-crowded roads and ever increasing pressure on an area that is fast losing its appeal for many long-term residents. I spoke to people today who have lived here for over 40 years, and they were near to tears. There's only so much pressure you can put on one area, and we've put up with a lot in recent years.

You might want to ensure any sports facilities are indoors, so the children aren't breathing in traffic fumes. Evening classes and a bookable space are always useful in a community.

If a focal point of the development is going to be some shops, cafes, etc, and it's going to be built in the most built-up section (high-rise buildings at the bottom of the slope), can I suggest that you (a) make sure they build a big underground car-park and (b) make it a covered / closed-in area (like a mini-shopping mall), as the weather here is mainly cold and windy. We get strong, biting winds up Goldstone Valley which will reach the bottom of Toad's Hole Valley - and we get a lot of fog. The site is very exposed to the elements / traffic and I can't really envisage many people wanting to sit outside most of the year. Yes, we get some warm days in Summer, but if you want it to be used and loved all year-round, it should have a roof and walls! Bear in mind too that the bottom part of THV is mostly in shadow during Winter - it gets very cold! Also, to help the new community blend with existing communities, you need to make places that we can visit too - so we need parking and something worth visiting. The idea of a National Park Visitors' Centre is great - as long as you have lots of parking, some shopping and a really big decent cafe. Linking Goldstone Valley, Toad's Hole Valley and the National Park would be great too.

Air quality can get really bad here - I've developed asthma in the last couple of years. You also need to be aware that heavy rainfall often leads to flooding across the bottom of KGVI Avenue - it's literally like a river appears out of THV - and it can get pretty hairy down Goldstone Crescent. Our drains empty more slowly in heavy rain too.

Most people round here rely on their cars to get around. We're quite a long way out from the centre. If people want to get to the other side of Brighton or over to Lancing and beyond, they hop onto the A27 and go round that way. I've tried using the buses, but they're not very frequent and they take ages. It's very steep round here and the weather's not reliable, so only the very fit few cycle to and from work. If it's shopping, then a lot of people go to places where they can park, like George Street (after 4pm/weekends) and Blatchington Road, various big shops on Old Shoreham Road and the Holmbush Centre at Shoreham. People with young kids nearly all use cars, and my elderly neighbours (and those with disabilities) nearly all seem to rely on cars. Any development will need a lot of parking provision. I don't think there's any way of avoiding that.

We see the main issues as being: How to create a dynamic and diverse community, rather than a "dormitory" for people working away from the area. How to encourage a car free neighbourhood, while maintaining good, sustainable transport links How to minimise the affects of air & noise pollution from the A27 & King George VI Avenue What other funding opportunities are available to ensure the solution works for the stakeholders and the community? How are the Community's needs to be reconciled with Stakeholders' needs for commercial viability?

Will acoustic banks, or other barriers, be incorporated to separate the site from the A27 and King George VI Avenue? Where are the proposed points of access to the site for vehicles and pedestrians? Can the development encourage a nett zero cut/fill design, to minimise transportation of spoil, etc?

How will the proposed development of Court Farm relate to the THV site? Do any existing Planning Consents for Court Farm constrain the options available for THV site (e.g. access via A27 roundabout, etc)?

How are the housing, offices, school, public open spaces, children's play, food growing, community and retail to be allocated to zones on the site, to make best use of the site topography,

usage, movement flows, etc? Will a 3D CAD model be created to help design development and visualisation? Where are the proposed points of access to the site for vehicles and pedestrians? The proposed neighbourhood centre should be a great focal point and benefit to the community. Is it possible to keep it as well used as possible to make it a small scale venue for arts and social life in the evenings and at weekends? Has any market research been carried out to determine what facilities/shops would be most needed/successful? Small local supermarkets, such as Co-op (who will often host a Post Office in their stores) seem to be quite successful at present, but many local shopping precincts appear to be struggling and there may not be enough daily custom to support coffee bars and small shops. Maybe a more ad-hoc cafe could be part of the community centre? It may be a good idea to encourage businesses that attract repeat visits like the Wood Project or a small flea market.

Given that this land is privately owned, how will the development optimise the provision of affordable housing units, as a means of addressing the Housing Crisis? Can alternative funding models (e.g. The New Civic Housebuilding Model) be considered as a way of delivering more truly affordable homes? Can the THV development encourage zero carbon buildings (e.g. passivhaus or similar) over and above Building Re requirements and renewable energy generation? How will the development encourage good quality design, to achieve high density, people-friendly homes? Will there be opportunities for self build developments (following Brighton's earlier Hedgehog example - built to rent by the tenants themselves)?

Has any market research been carried out to determine what facilities/unit sizes/office types would be most needed/successful? Out of town offices are usually only competitive if they are cheap to rent.

Also, if possible, some thought should be given to older children and young people - e.g. a bike track or small skate park. Too often teenagers in such areas have no where to meet except the supermarket car park!

Rather than rely on district heating, it may be better to consider a strategy of zero carbon buildings that are virtually self sufficient for energy and having communal renewable energy generation (e.g. PV's, wind, ground or air source heat pumps, etc). Obviously this may not be an attractive proposition for speculative house builders.

One of the biggest challenges of this development will be the provision of good transport links to THV, without relying on cars. Where are the proposed points of access to the site for vehicles and pedestrians, and which parts of the site are being considered for transport hubs/bus stops? Has there been any initial consultation with local bus companies to determine feasibility for bus routes & bus stops?

Obviously the typography of the site is challenging but it would be desirable to have the roads as a network, avoiding cul-de-sacs and pseudo country lanes!

Rather than rely on district heating, it may be better to consider a strategy of "passive" buildings that are virtually self sufficient for energy and having communal renewable energy generation (e.g. PV's, wind, ground or air source heat pumps, etc). How can the THV development ensure that affordable housing and business accommodation is available in the final scheme?

Make sure you put in enough parking. The hove park area already suffers from the office workers from the nearby legal and general building blocking up our verges all day.

doctors surgery provision will be essential on this site, as the area is lacking

I'm really concerned about the huge increase of traffic that will now be routed down goldstone crescent and neville road with this huge development and all of it's traffic having this as it's major route into the city. This road is already quite busy and congested with parked cars. It's dangerous already for our kids when they cross the road to get to school, especially as so many cars are parked on the verge. Significant though needs to go into ensuring that there are safe ways to cross these roads for children making their way to school.

Need to minimise disruption during the building phase for the homes in the immediate vicinity. I'm particularly worried about the loss of King George 6 Ave.....and the large increase in traffic that we will suffer when it is eventually servicing this new development.

I am very concerned about the wildlife that lives in the field. Having grown up in a flat that overlooks the field, I have spent many hours in that field and have seen across a wide variety of different species of animals including foxes, rabbits, mice, shrews, frogs, geckos and so many unique and unusual insects. Will there be a plan in place to move these elsewhere? Or will they simply be forced to move once the building work starts?

Make houses only available to people who have lived and work in B&H for at least a year, who will either own the property for a minimum of 10 years, or will be social housing owned by responsible housing associations with fair rents. Do not allow speculators to buy. Do not sell to private landlords. Exceptions could include key workers.

I am very concerned about repeated references to housing possibly being even more than 700 units. The amount of traffic in the area along King George VI Avenue and Dyke Road and the roundabout at the top of the hill is already a major problem and also increased housing will spoil views to the South Downs from the whole area of existing housing in the vicinity

I am very concerned about repeated references to housing possibly being even more than 700 units. The amount of traffic in the area along King George VI Avenue and Dyke Road and the roundabout at the top of the hill is already a major problem.

The purpose of the document seems to be to mitigate a perceived gap in that there is no focus to the suburbs of Brighton, and that this site could be used to implement such a 'mini-village'. Nothing could be further from the truth. The Goldstone valley has a focus around Hove Park and further in to Hove. The site came into being as a way to extend Hove towards the South Downs as part of previous building planning. No social focus is required.

The site itself is totally unsuitable to be worked on. The same issues will affect this site as have been realised as part of the existing Goldstone Valley. That is - the site is extremely steep and difficult to walk up / cycle up. The majority of runners in the area use Snaky Hill as a form of 'punishment' and test themselves by jogging up it. Many fail. As such, it will only be suitable for cars. There is only one Road from A27 towards Hove (Snaky Hill). This is currently extremely busy in the mornings with cars lined up down the hill. Without direct access to the site from A27, the road will become a no-go area. The area is extremely exposed and windy in the winter and becomes a no-go when it snows. The land is chalk and so will be used as a natural drainage area. Digging this up and putting pipes for water, power etc is going to be very difficult and costly - something a lot of developers would not want to entertain - especially for a school and other businesses whose sale model will be very different. In short, if one were independent, the best use for this land would be a large vineyard - perfect ground, bowl shaped area facing south. Not ideal for building on.

The planning policy and the councils duty to do so are clear. These comments are about the site in question. There are plenty of other brown field sites in Brighton that lend themselves to development (are flat, closer to town, nearer to public transport etc etc).

This website is prone to crashing so I have completed the important bits and submitted them.

One of the obvious problems with the topography of the site is the access as it is bounded by 2 busy roads that act as a through route to Hove (King George VI Drive) and bypass (A27) I would be concerned about the safety of both vehicles and pedestrians accessing the site. There will be increased traffic and noise for homes in close proximity to the development. I would not be happy with buildings up to 6 storeys as I feel it would affect the visual impact of the view up to the South Downs.

Consideration needs to be given to the development of Court Farm as well as THV when thinking about the total impact on the infra structure, traffic and transport. These 2 developments can't be considered in isolation from each other

Aspirational architectural speak here but is it achievable or are residents being blinded by science?

I hope the neighbourhood will be in character with surrounding areas. I am concerned about the density of the proposed housing and the knock on impact on the locality adjacent to the development.

A sixth form entry school will not be sufficient to serve the number of families that will be living on this site in the long term therefore a 'through school' (presumably this means infants to secondary age group) is vital.

A health hub not just a GP surgery will be necessary in a development of this size. This should include all primary care facilities with access to midwives, health visitors district nurses and pharmacy services.

Bus links will be vital but will only be used if the council re-consider their charging structure for bus fares. At present there is absolutely no incentive to travel by bus as the fares are so high. There should be no residents parking scheme or pay and display / pay by phone in this area or it will encourage motorists to seek free parking in surrounding roads off site.

The document is very comprehensive but far too lengthy and verbose to read in great depth, it is biased in favour of the council and there needs to be an executive summary produced that simply gives the facts. This development is going to have a significant impact on the local area and I would favour a smaller, less densely populated plan that is sympathetic to the surroundings. The safety of King George VI Avenue needs urgent consideration as this is already a busy and at times dangerous thoroughfare.

The aims and objectives are good, but do not emphasise improvement of the road network in the area, particularly the increased pressure there will be on King George VI Avenue which is already a dangerous road. As this land is to be used for the good of the city and community, this would be an ideal site to relocate the Royal Sussex County Hospital which is currently squeezed into an unsuitable site in the city centre with no room for expansion and difficulties of access by patients and staff. Access would be from the A27 for those outside Brighton and Hove, reducing the impact of traffic into the city centre. This could be a world class hospital for the region. The current site of the hospital is very suitable for housing of various designations in a desirable area. Emphasis should be placed on retaining and enhancing the feel of the SDNP within this area. This is downland even though it has been degraded to scrubland as it is so difficult to access currently. We need to adhere to these policies. Some of the proposals do not e.g. height of buildings, improvement of road network.

Could not access this as error on system.

Currently there is a 1960s eyesore block of flats (4 storeys) at the bottom of King George VI Avenue which is totally out of character with the rest of Goldstone Valley. The valley consists almost entirely of attractive 1930s- 1950s detached and semi-detached homes. This block should not be used as a precedent to encourage building up to 6 storey buildings in THV.

Ensure enough parking spaces in THV so that there is no overspill into surrounding areas.

Maximise public transport to and from THV.

Very keen to see world class solutions for the environment which we can showcase as a green city.

More traffic on already busy and dangerous King George VI Avenue is a concern.

A27/Mill Hill/Dyke Road Avenue/ King George VI Avenue already very busy and congested at rush hours. Need to allow walkers and cyclists access to the SDNP without having to cross these busy roads.

The THV development proposal is out of character with Goldstone Valley and the SDNP being much more urban. It should have a more country and Sussex charactered feel.

Does not deliver against its own objective 1.2. Full of technical acronyms, which are not easy to follow if you are not an expert. Gives the impression of a smoke screen to what will be done. Why no indication of how the Ground Source Protection Zone status impacts on the development. Green spaces, particularly natural / unmanaged are at a premium in the city what is the plan for the steep bank to the west of the site that is protected as a Site of Nature Conservation Interest (SNCI)

Why was Court farm site not included in the site development and how will this development impact on the rest of the Toads Hole site.

Goldstone valley/ Hove Park area is primarily a 1930-50's development of semi detached and detached houses, not apartments. How will this development fit with the area. While the document talks about better public transport and cycling, how will this be integrated into the surrounding area. ie new dedicated cycle route into the city centre. Will there be enough parking for vehicles and how are you planning to manage it to ensure it does not impact on the surrounding area

Little detail on what the standard should be achieved and how it will be measured as a success. Given the fast changing life styles, this is a key area that needs some good targets of how it can be achieved, plus how it links in with the Court Farm development.

Why was this site allocated for Housing, rather than an opportunity to move an existing site out of the congested city, like the Hospital, Goldstone retail parks, Hove Bus Depot, so these central sites could be developed to housing

Given changing work styles, ie working from home and the gig economy. Where is the demand for more office space come from and should it also include manufacturing units.

Given the city policy of moving children across the city. How will you ensure the school does not 'create school run' traffic congestion in the surrounding area, particularly at the A27 junction.

The shop proposal looks like something from the last century, not taking account of 21st century shopping behaviour. No talk of a pub/ restaurant to act as a the community centre, also talk of

links with the south downs park, I see no provision for a new pedestrian/ cycle route across the A27 to access the South Downs Park by the A27 junction.

Agree with the objectives, however would like to see clear targets written in the document, rather than referring to a list of other documents, which gives the impression of trying to create a smokescreen and not really caring for the environment

lack of detail on how vehicle movements will impact on the surrounding areas, particularly the extra traffic on George VI avenue and the associated pollution, which the document already states can be quite bad due to the nature of the road

the document talks as if Toad Hole valley is a stand alone village, not an area of Hove adjoining existing communities of Hangleton and Goldstone. How will it benefit these areas.

Construction on this site will have a big impact on local road network which is also very busy. what are your proposals to minimise the impact of this traffic and the noise/ pollution from the construction site.

shame the link does not work

This a very flowery document, that lack any relevant detail for a local interested in understanding the proposal. It seems to believe that Toad Hole Valley is a stand alone community, rather than a new residential area within the wider city. It also does not address the question why Court farm was not included in this vision, plus whether this is the right kind of development of this site, ie why not use it to relocate some other facility from within the city, freeing the land for accommodation in the centre, rather than putting people on the edge of the city between two busy roads. Possible facilities would be the hospital, Hove bus depot, Retails Parks at the bottom of Hove Park. I went to the consultation in Hangleton and was disappointed by the lack of information both on the boards and from the staff present, who seemed to have been poorly briefed and did not know the area at all. Where you just ticking the consultation box

Far too many references to possibilities without proper detail. No reference to the influx of people due to come into Goldstone Valley such as the large school at the Engineerium site and the transfer of hundreds of staff from the Legal & General office in London to the Hove office - neither of which had any sensible parking allocated to them. Add to that the flats being built along Goldstone Crescent and you have a lot of people already coming in and none of this is reflected in this plan. Parking and traffic has been seriously under-stated.

We don't have floods in the Valley but this may well change. The density of the building requires significant resolution to the problem of waste water - the site is very steep and the water will accumulate at the bottom of the site - currently the natural environment absorbs heavy rain but I remain to be convinced that your idea of piping (4.64) will be adequate to need. Also it is madness to expect traffic to come out onto King George VI Drive (4.56) - which is already a notorious traffic danger spot. The least you should be adding is a proper size roundabout at the bottom of KGVID and Goldstone Crescent to assist traffic flow, but IN ADDITION you should be looking at an alternative route alongside KGVID. The pollution from static traffic all trying to access that road will significantly affect air quality and you are building in traffic accident spots if you don't review this flippant plan - honestly - street facing frontages and central reservations? It's greenfield so NOW is the time to put in proper traffic measures. Also a tunnel to join up to the SDNP? Or an unspecified 'link'? (4.57). Where is the detail for this?

Far too high a density of building and inappropriate design proposals out of keeping with the neighbourhood. The parking standard is laughably low when 50% of the housing proposed is for 3 bedroom dwellings. Add to the mix the influx of a new school in Hove Park with no parking to speak of (and by the way the cars are already parking all the way up the residential roads so the naivety of thinking people will walk with their children is exposed) and Legal and General's site expansion in the locality with their London staff transport requirements and you are making a pig's ear of it. Forget the daft idea of street facing frontages etc resolving traffic access and build a proper route alongside KGVID. As a minimum plan for a roundabout at the junction with Goldstone Crescent and THV but you really should get your road planners to put in better access plans. All lovely but don't let it become another Southwick Green. Include lots of public transport so that our teenagers can get into town and not hang around getting bored. Also, given the steepness of the site, is it sensible to expect older residents to manage the climbs? Very pleased to see the inclusion of a parade of shops alongside a doctor's surgery, as the neighbouring communities already have their amenities stretched and this should support the new community. Just ensure that there is adequate parking spaces to allow people to use the amenities - Hangleton has a severe parking problem because once again the Council has not recognised that people park to use the shops, library and medical centre.

Please ensure that you provide more parking spaces for housing and businesses and also that public transport is readily available. Will the school cater for all the families on the estate and will there be adequate parking for staff and visitors? I also hope that the medical facilities will be of sufficient size to cater for what is really a new town on the outskirts of Hove. Housing design does not look to be in keeping with the neighbourhood character.

Essential that retail units are available to serve the community but once again plan for car usage. It's a great vision that everyone is going to give up their cars but the reality is very different, so instead of having a 'nanny knows best' green approach which dictates an ideology onto the public, please be realistic. The Greens used Brighton and Hove as an experiment and we are living with the consequences of their dreaming.

Please do not have a re-run of the absurd parking situation of the Bi-Lingual school in Hove Park - a good initiative ruined by Green ideology which is already overspilling into residential streets. Definitely support this but on basis that adequate provision is made for access and parking. My children all carry loads of sports and music equipment and it is unrealistic to expect parents not to drive them in with so much baggage to tote around. Will the school be just for families in THV or will pupils be transferring from other parts of the city? If so, has thought been given to providing dedicated school buses like we have at Cardinal Newman? Public transport links to the main city are also vital as teenagers will want to go into town rather than hang around evenings and weekends - also if they are to find part-time work in the city they will need a service to get them in and out of town.

When you give details on what you mean by this tunnel and 'link' we can better comment on the proposals. All sounds great but it's just words at the moment.

Waste water - no floods in Goldstone Valley because the THV site is a natural sponge. Put all that building on it and the potential for it draining away is very compromised. It is a very steep gradient and water always finds a way to build up and flood so I would like to see much more reassurance on the detail of how planners are going to provide truly adequate drainage. Also air quality is going to be rubbish with lots of traffic idling because they have to use KGVID which is already a traffic blackspot. Please revisit the re-routing of KGVID or putting in a parallel road with roundabouts to assist traffic flow. This is a huge problem.

Essential but will only work if you take into account access routes (see above) and provide regular and plentiful public transport.

Lovely thinking and I hope that it succeeds.

What does this mean? Absolute gobbledegook. If you want reasoned comments than please put what you mean in plain English. I was mystified.

This is a greenfield site so the Council has a real opportunity to build in all the points which will provide a sustainable and successful outcome. Please don't waste this opportunity to get it right - don't be pennywise and poundfoolish. There is pandering to ideology versus the reality of a workable solution for residents and the Greens have shown us how that can go badly wrong - and how we suffer for it. This is about people's lives and we deserve better than a cheap and unrealistic proposal which is all style and no substance.

Naturally, my wife and I are bitterly disappointed that planning has now been granted for the development of THV. , but understandable in the light of the terrible under-provision of housing stock due to the previous council's reluctance to award planning to more worthy applications over many years. However, whatever the outcome of this development, to proceed without giving due consideration to the huge extra stress to the existing roadways and access points, especially at the end of Goldstone Crescent, is disrespectful to the existing rate payers and in my opinion downright inconsiderate and potentially negligent. This junction at the end of Goldstone Crescent, where it meets King George, is already terribly dangerous. It is used as a rat run by too many cars and lorries leaving Hove, especially at peak times, morning and evening, and by so many speeding vehicles approaching this area from both directions on the hill. The build up often runs way past our property, some one hundred yards from the junction. The extra traffic flow, resulting from such a huge project, will make this area even more polluted by the very slow moving and stationary vehicles, blowing out exhaust fumes and add extra danger to this already hazardous junction. Please think again about the existing neighborhood and residents and reconsider the level of pollution and danger that you are asking us to accept, before agreeing on the final planning.

We are residents of Goldstone Crescent and also work in the New England Quarter. We also belong to a variety of societies [e.g. National Trust] and also have a home in Beijing. New England

Quarter: We have watched this being built and as a city work environment is acceptable but the layout of the area is poor; the roads are far too narrow for the throughput of northbound traffic heading to Hove; there are daily bottlenecks in New England Road as traffic merges under the bridge, the closeness and height of the buildings produces mostly gloomy streets with whirlwinds and wind eddies and the area feels a little run down already despite being only a few years old [indeed some parts unfinished]. Many of our clients live in the apartments [probably more than 100 flats occupied this way] and many are also occupied by university students. Maybe this will change once the universities have constructed more residences on site. The flats were overpriced at the point of sale and seem mostly to be buy to let properties. Similarly, there is a creeping incursion from the south as Goldstone Crescent is slowly turned into flats. We are buy to let owners ourselves and looked at buying property in the Quarter but the construction quality had underlying shoddiness and we considered the investment poor value Toads Hole Valley: With the farm at the top of the hill already having planning permission for taller than expected and denser population, we can see that TVH is going to be larger replica. There appear to be few entrances/exits to the site, the ideal would be to have entry from the A27 [perhaps this would steal too much valuable building land] and the only entrance appears to be at the already ridiculously difficult junction of Goldstone Crescent and Snakey Hill. On weekday mornings it can already take up to 10 minutes to exit our drive. Also, the amount of lorries required for building would be excessive for a built up area and they are almost certain to head to or from the site up this already narrow and parked-in road. Clearly there is a need to build more houses and the choice of site is not really contentious; it is the balance of the buildings; Will tall building be restricted to the bottom of the valley or allowed to protrude above the skyline? How wide will the roads be; all well and good to try to limit car ownership in theory but in practice not sensible. With 700 dwellings, where will people shop? be educated? see a doctor? etc. How long will the open space remain sacrosanct? Above all, this would be a fantastic opportunity to make developers pay for realistic access by road but as is usual in the UK, we are sure the opportunity will be lost. Also, it appears that the industrial units will be built almost up to the edge of Snakey Hill; drive around Freshfield Industrial Estate to get the feel As for the character of the area, already our road is turning into an area with many multiply occupied housed rather than the family homes they were designed to be. Building a 'downtown' type of area on the edge of the South Downs seems like the decision of mad people, the benefit will be firstly for the contractors, developers and freeholders, the second for the council to boast of a certain number of new homes completed, thirdly, if the quality is good for those who will be able to live in the new properties and lastly the existing residents, who all have a vote, will lose the tranquillity for which they have paid high prices. We are not nimbys and realise that the land is bound to be built on but feel that this could be done in less wholesale way; preventing blight, noise pollution, traffic pollution and air pollution along the length of the valley. The council will probably give way and let the developers ride roughshod over them while the councillors sit back offering platitudes and excuses for their ineptness. We hope that the council has enough guts to stand up for what local people would like, we are not extreme but realistic. We can see what has been spoiled elsewhere and do not want this to happen in an uncontrolled way. Gordon and Ellen WATTS

We are residents of Goldstone Crescent and also work in the New England Quarter. We also belong to a variety of societies [e.g. National Trust] and also have a home in Beijing. New England Quarter: We have watched this being built and as a city work environment is acceptable but the layout of the area is poor; the roads are far too narrow for the throughput of northbound traffic heading to Hove; there are daily bottlenecks in New England Road as traffic merges under the bridge, the closeness and height of the buildings produces mostly gloomy streets with whirlwinds and wind eddies and the area feels a little run down already despite being only a few years old [indeed some parts unfinished]. Many of our clients live in the apartments [probably more than 100 flats occupied this way] and many are also occupied by university students. Maybe this will change once the universities have constructed more residences on site. The flats were overpriced at the point of sale and seem mostly to be buy to let properties. Similarly, there is a creeping incursion from the south as Goldstone Crescent is slowly turned into flats. We are buy to let owners ourselves and looked at buying property in the Quarter but the construction quality had underlying shoddiness and we considered the investment poor value Toads Hole Valley: With the farm at the top of the hill already having planning permission for taller than expected and denser population, we can see that TVH is going to be larger replica. There appear to be few entrances/exits to the site, the ideal would be to have entry from the A27 [perhaps this would steal too much valuable building land] and the only entrance appears to be at the already ridiculously difficult junction of

Goldstone Crescent and Snakey Hill. On weekday mornings it can already take up to 10 minutes to exit our drive. Also, the amount of lorries required for building would be excessive for a built up area and they are almost certain to head to or from the site up this already narrow and parked-in road. Clearly there is a need to build more houses and the choice of site is not really contentious; it is the balance of the buildings; Will tall building be restricted to the bottom of the valley or allowed to protrude above the skyline? How wide will the roads be; all well and good to try to limit car ownership in theory but in practice not sensible. With 700 dwellings, where will people shop? be educated? see a doctor? etc. How long will the open space remain sacrosanct? Above all, this would be a fantastic opportunity to make developers pay for realistic access by road but as is usual in the UK, we are sure the opportunity will be lost. Also, it appears that the industrial units will be built almost up to the edge of Snakey Hill; drive around Freshfield Industrial Estate to get the feel As for the character of the area, already our road is turning into an area with many multiply occupied housed rather than the family homes they were designed to be. Building a 'downtown' type of area on the edge of the South Downs seems like the decision of mad people, the benefit will be firstly for the contractors, developers and freeholders, the second for the council to boast of a certain number of new homes completed, thirdly, if the quality is good for those who will be able to live in the new properties and lastly the existing residents, who all have a vote, will lose the tranquillity for which they have paid high prices . We are not nimbys and realise that the land is bound to be built on but feel that this could be done in less wholesale way; preventing blight, noise pollution, traffic pollution and air pollution along the length of the valley. The council will probably give way and let the developers ride roughshod over them while the councillors sit back offering platitudes and excuses for their ineptness. We hope that the council has enough guts to stand up for what local people would like, we are not extreme but realistic. We can see what has been spoiled elsewhere and do not want this to happen in an uncontrolled way. Gordon and Ellen WATTS

The access from Goldstone Crescent and Neville Road to Snakey Hill is already difficult/dangerous. A large development of 700 homes and other premises will increase traffic flows substantially. A more comprehensive road scheme needs to be addressed to avoid serious problems.

Too many homes, offices, school etc to be built in such a small area. The impact of all the extra traffic on the Goldstone Valley, Dyke Road and Hangleton will be impossible to absorb. King George Sixth Avenue is already a dangerously busy road with vehicles travelling at excessive speed in both directions. This road needs to be straightened, widened, or relocated completely. Too many high density buildings. Not enough green space planned. The landscape and area does not lend itself to such a medley of multipurpose development. Too many dwellings in too small an area. There are enough unoccupied offices and buildings already. More are not needed. Yet more traffic at school time. More mad mothers charging along Goldstone Crescent to get the little darlings to school. We have enough already with the new school in Hove Park. People seldom use local parades of shops. Look at the demise of Goldstone Valley Shops and Woodland Parade. Buses now have difficulty negotiating the narrow roads in this area. What will happen when there are more of them together with hundreds of extra cars? Will this happen when the real preference is for buildings? To sum up, my thoughts are that this is the wrong scheme in the wrong place. Too many homes and too many more people in such a small area whose infrastructure is unable to cope. Maybe a retail business park would be a better solution..... Placemaking: Not likely.

The problem with development of this site is the amount of extra traffic which will be generated, so will detrimental to the lives of residents in the area. Nevill road is deadlocked already during peak times taking the traffic from the bypass into central Hove & the seafront. Parking is also a major problem. There needs to be a major traffic management system in place before any development of this site is approved. There are 4 schools in the area which generates lots of cars & children crossing roads. More cars can only make it more dangerous.

I am concerned that the increase of traffic will affect the traffic flow for the adjacent 4/5 miles. Currenty Hangleton road is gridlocked between 8 & 9 am every weekday, and from school exit time until 5.30 ish. Parking and the amount of houses having to remove their front garden to have

somewhere to park will increase dramatically. Overspill parking will become a problem as well. The Council seem to have disregarded the requirement for better access points to the new development with the current high level of traffic will cause issues and great deal more congestion. Multiple access ie from Burwash & etc is required.

Density of people and vehicular access will make this a poor prospect if the access is via King George Avenue (Snakey)

Other areas are more suitable and I believe currently under review.

Submitting planning application: Not understood

Masterplan: Not appropriate

I think this a ludicrous idea. The traffic congestion and accompanying pollution is bad already. The people who would live here, particularly those nearest to the A27 would suffer most due to the increase in traffic. There will already be increased traffic and pollution from the proposed development next to the roundabout at the top of Dyke Road Avenue. It is bad enough now, even before this development, what will it be like if both these developments go ahead? I think I will stay at home!

This piece of land is a great buffer for Hove residents in terms of pollution and road traffic noise. Where I live nearby, we have a constant drone of traffic noise from the traffic on the A27. The people in Toads Hole Valley would be extremely stressed by this.

As I said before the congestion is bad enough already.

The development of Whitehawk shows how high density of properties increases crime and social misbehaviour.

Please do not pass this area for development on this scale.

This development should be a non-starter.

This site is not suitable for housing of this density.

It's acronym and aspiration heavy, with little real substance. The window-dressing serves to obfuscate. For example, what - in this context - does 'vibrant' mean? Street theatre? Jugglers? Stabbings? It fails to address, or even to identify, the greatest challenge in this development: namely that the Council simply wants to cram too many people into too small an area.

It is almost adequate. For example, it says that the fairly steep incline of King George VI Avenue influences driver behaviour. It would have been helpful to know what constitutes a 'fairly steep incline', the ways in which this might influence driver behaviour, and whether those influences were for good or ill. It did, however, produce a laugh out loud moment when it explained why no steps had been taken to insulate an empty field from the noise created by traffic on the by-pass. Probably necessary deeply, deeply boring.

Two issues from the Strategic Environmental Assessment should probably have been included here. The first is the serious issue of the local economy: "GVA per head remains below national and regional average and suggests that there is scope for Brighton & Hove to have a more productive economy, e.g. by creating more jobs in businesses and sectors that produce more value per worker." Applicants should be asked to explain how their proposals contribute to the improvement of the local economy. For example, there is an area in Portslade that is given over to business use, but the road width and layout is inadequate to that purpose, the consequence being that the roads are clogged with delivery &c. vehicles. This development includes business premises that are to be flexible as regards future use. The infrastructure, especially the roads, needs to be equally flexible. The second is the sneaky provision, "Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations". For almost as long as I can remember, Brighton & Hove Council has tried to discourage private vehicle use by making Brighton really unpleasant to drive through, and really expensive to park in. At best, this approach has resulted in the suburbs being used as car parks. Many people don't have any choice but to drive in or through the city, so making their lives more difficult does that, but that alone. If this development is not to end up as something that Brighton & Hove Council is rightly ashamed of, then it needs to ensure that there will be adequate off-street parking for as many cars as are likely to be found on the development. These days, many households have more than one car; and no matter what the planners might have you believe, these cars are no longer the size of an Austin 7. Additionally, many tradespeople use a van as well as the household's personal vehicles; and, with the increased tendency for adult children to live at home, it is not unusual for a household to have four vehicles. Those households will not give up their vehicles if they move to this sort of development: they will merely park them wherever they can, possibly in the neighbouring estates.

What happened to 'Amounts of Development', the most contentious issue of all for me? Six storeys? You're having a laugh. Such a development would be completely out of character with local buildings. There are several reasonably-attractive pictures in the supplementary planning document, but none seemed to show developments of density similar to that which is proposed. Ideally, such a development undertaken 20 years ago should have been shown, so that we could see what such a density looked like when it was no longer new, because the development will be old for a lot longer than it will be new. Bear in mind that those who designed Park Hill, Sheffield; the Tricorn Centre, Portsmouth; and the old Churchill Square; did not set out to create an ugly development, and were probably proud of their work at the time.

This sounds a bit like something between 'The Prisoner' and '1984'. Have you ever given a child a toy, and watched it play with the box that the toy came in? You can try to create a centre, but the centre - if any - will always end up where it wants to be. It is the centre of gravity, not the geometric centre nor the centre of commerce. It would make sense to ensure that all of the local shops are indeed local shops, and not national chains or franchises. Otherwise, you will simply end up with a dozen branches of Starbucks.

What is 'viable' in this context, and what does an unviable development look like? This seems to me to be such stuff as dreams are made of, and unlikely to endure over the longer term. Is it intended that there should be restrictions on extensions to the houses on the site, to prevent an already over-populated site from becoming even more densely populated?

Heavens, but this is tedious. What does 'vitality' mean in this context? Would the centre of Brighton be described as 'vital' or even 'vibrant'? If so, then why is the area so dependent on a few employment sectors, and why does GVA per head remain below national and regional average? What we need is businesses and employers who are willing and able to make a profit, to pay their taxes, and to invest in their workforces. It doesn't matter whether or not they are knowledge based. "help animate the new neighbourhood centre": like 'The Simpsons' is animated? The Supplementary Planning Document suffers from a number of errors; 'break' for 'brake'; 'meter' for 'metre'; 'Six FormColleges' for 'Sixth Form Colleges'. It is as if no-one cared enough about it to make it as good as it could be. Hopefully, the proposed school will do rather better, and instil some sense of pride in workmanship so sadly lacking in the Supplementary Planning Document.

Again, what is 'vibrant' in this context? And what are 'walking facilities', apart from some ground to walk upon? I object to the expensive hegemony that has been accorded to cyclists, but not as much as I object to the ridiculous idea that cyclists and pedestrians can use the same piece of pavement or tarmac: ask anyone who has walked a dog on a lead, or a toddler on reins. Cycling up those slopes will be a challenge, but cyclists going down the slopes ought to be able to achieve 40 mph easily. Maybe the doctor's surgery should include a trauma unit, to accommodate pedestrian victims.

Again, this is long on aspiration, and short on reality. It does not mention the effect of simply transferring pollution elsewhere, as is the case with electric vehicles. The electricity to charge them has to come from somewhere, and that might not be a renewable source. Furthermore, those batteries have a relatively short life, and have some really nasty chemicals in them.

How do you improve the "legibility ... of existing links"? Call me cynical, but the transport system that we have now isn't exactly wonderful. Given that the Council could not get the current transport system to work as well as it might, I have grave doubts that it could do any better with a new transport system. The proposals for King George VI Avenue appear to me to be entirely inappropriate.

I guess that someone was playing buzzword bingo. It's worthy, aspirational, but nowhere near sceptical enough.

This all seems obvious enough, and could have been summed up by saying, 'We're not going to put the cart before the horse.' However, if the Council can do all the wonderful things listed, why isn't it doing them already? Please don't say 'lack of resources': if the Council didn't waste so much money, it would probably have all the resources it needed.

There is an opportunity to make this development truly exemplary, to make us proud - or at least less ashamed - of Brighton & Hove. But you can't have the penny and the bun. If you want an exemplary development, you can't have that many dwellings. If you want that many dwellings, then resign yourself to the fact that it will not be something in which we can take any pleasure, and that in fifty years' time, people will be asking how we could have let this happen.

There needs to be measures to protect the SNCI from future development. King George VI Avenue is a dangerous and busy road urgent attention needs to be given to this irrespective of the Toad's Hole Valley development which can only make this road busier and more dangerous THV

has laid fallow for many years. It is a wildlife haven the flora and animals living there needs to be assessed and action taken in relocating mammals to other locations as necessary. of particular concern is the hedgehog population which is quite large in the hangleton and knoll area and it would be expected that they inhabit THV as well. Whilst not protected their decline in Sussex is immense and of concern Hedgehogs were relatively frequently seen in Goldstone Valley around 10 years ago but now rarely if ever seen .

This is in danger of turning into an ugly development much like around Brighton station due to the pressure to provide sufficient accommodation the proposal to build six storey properties is of concern as this indicates a large population in the valley there seems Beth little mention of how traffic will be managed into the valley and the effect on current roads it's unrealistic to expect residents to use public transport thus won't happen with 700 plus dwellings there us a real risk that the area will end up looking like a giant car park with 7 storey dwellings in between it

The area should not be a magnet for visitors from elsewhere there will be enough demand on the infrastructure of the local area with these new dwellings without adding to that by attracting more people because of the amenities

These houses must be affordable for local people the last thing Brighton needs us to encourage more people to move here who can pay large amounts for houses adding to the population if worse buying the houses as buy to let and renting them out at exorbitant prices benefitting them and no one else Not sure about businesses if it's factories etc then I would not be happy

This would only encourage more traffic into the area

This is a farce everyone cars you won't stop it

There needs to be a new road built through THV. I live in goldstone crescent the traffic is bad now and getting worse this development will only increase this. I would like to see goldstone crescent closed at the entrance by king George avenue I can see no other solution to the traffic flow along my road as a result of this new build

A new road replacing king George 1v needs to built through THV from the bypass to accommodate the traffic

The re-routing of King George VI Ave would allow the creation of a green open space with views to the sea and toward the downs. Foot paths, cycle routes and benches could be used to facilitate its use year round. Re alignment of this road toward/parallel to the A27 would contain main routes down wind of the prevailing wind direction rather than hemming the new development north and south. KGVI Ave is a dangerous road, the connections to it Goldstone Crescent as an example needs to be improved currently. This proposal will bring additional traffic pressures and I'm concerned that more accidents will occur if it isn't improved. I'm further concerned about overspill parking affecting KGVI Drive. Particularly if the Ave is built up to include commercial properties. Goldstone Crescent is already used as a rat run into Hove and I'm concerned that this will only get worse without appropriate improvements being made.

The proposals for this site will destroy an area which is an integral part of the environs of Hove as it overlooks the National Park.

I really do not have time to go through the document in detail but view this as a poorly conceived proposal in its entirety. There is little need in the town for further retail and commercial development when one views the amount of empty property in the town much of which could be converted into residential property to give life to the high streets at then end of the day or demolished to make space for housing to be built. Try looking at those sites before destroying an area which gives a framework to the view of the national part. The access road King George Sixth is not suitable for the extra traffic which will result. Please do not destroy a green area in out city.

My only comment, is, there is no mention of improving or enlarging services in the area. Our doctors and hospitals are already full to bursting. Bus services are stretched, trains (in particular into London) are full, standing room only. More cars than there are parking spaces, especially in this area, because of the Hove Park, Business Park. Roads are full of pot holes already, and pavements breaking up. We are told there is no money to replace trees that have been felled, so we have to look are tree " stumps ", when we once had beautiful tree lined entrances, into Hove. More buildings will just make this worse, unless this is addressed first

This is a deliberately complicated way of asking for views - so that many will give up. I do not understand half the terms. My concern is the extra traffic which would be on the bypass - it is already horrendous during rush hours. I will repeat this sentence on every SPD

My concern is the extra traffic which would be on the bypass - it is already horrendous during rush

hours. I will repeat this sentence on every SPD

I am all for the highest quality / sustainable / green development. as long as there are council owned properties being built. I would like to see new temporary accommodation properties in the proposal. Anything else is a bad deal for Brighton and Hove.

I generally support this section

The role of the site as a potential gateway to the National Park, from the bottom of the Valley, should be emphasised. The role of the Valley in surface and groundwater flooding should be mentioned.

The Council should not forget that this site has been held for many decades at agricultural land value by the same tax-exile family and there should be no suggestion that it is financially 'unviable' to develop it at higher densities or with less affordable homes or other benefits to the City.

4.21 should refer to need to incorporate multi-functional greenspace and to improve links to the National Park via a tunnel.

Place making: Support

Housing: Support

Office: Other flexible land uses should be considered.

Education: Support

Comm + retail: Support

Environment: Support. 4.49 refers twice to GPZ1. This is an error. The surface and groundwater flood risks should be summarised and the SPD aim for net improvement to flood risk.

4.57 Links with the SDNP: the developer should make a significant financial contribution to a tunnel under the A27. The Devils Dyke roundabout is dangerous for pedestrians and cyclists and a barrier. TDV offers an easy, bottom of valley gateway.

Public realm + infrastructure: Generally support, especially the suggested ways of preventing surface water run-off given the sloping nature of the site. Climate change will increase intense rainfall so this will need careful design. More could be made of the opportunity to use blue green infrastructure to enhance biodiversity and promote climate adaptation eg by providing shading.

Dev phasing: Support

The Council have a unique opportunity to help deliver a leading example of a sustainable urban extension that can enhance the whole City. Please don't let it become another mundane suburb.

I have concerns over the additional volume of traffic this development would create in an area where the A roads are already full to tailbacks every night and morning. I don't think this is adequately addressed in the brief as a highly aggravated existing issue.

I don't see that the brief adequately deals with the impact on current communities and therefore I do not see that developers are being asked to acknowledge and deal with existing issues. I see it is highly aspirational but I am concerned that the impact of the development is underrated on the existing roads and communities it surrounds.

Most people's concerns surround what the Council intends to do with the housing. We know there is a requirement for social housing but it is unclear if the council will come to an agreement with developers or HAs to use a much larger % of the housing for social needs. Clarity on this from the council is needed. Clarity is also needed on the number of dwellings - 'at least 700' is not good enough. That could quite easily be 1000. And now guarantees on public transport - no new routes? Are you seriously considering extending existing routes to this development and making it even more difficult and time consuming for existing residents to get in to Brighton especially at peak times??

Only a small parade of shops for a development of this size? What if residents needs something else, have no car and there are no transport links?

The development at Toads Hole Valley could be in danger to becoming a ghetto. There will be no reason at all for anyone not living there to pass through which is a recipe for storing up trouble for the future. The proposal of so many homes will make the valley a concrete jungle. Where is there provision for a park? Small green areas and walk ways only provide more places for parking and unsociable areas for crime and anti sociable behavior. Not a stones throw away we have another estate. Parts of Hangleton are still deprived. How would this new environment be any different? Linking up the top of Dyke Road Avenue to the Devils Dyke Road requires improvement. There is no safe cycle way of footparth. One right of way even leads down to the slip road to the A27. Can all this be improved?

Bearing in mind this new development will be extremely visible. Low rise and park land would be preferable. Planning for the school should include a large proportion of green space. Considering the trail that leads behind West Blatchington primary school and links up with the Dyke Railway trail. No doubt when this was first created it may have been a pleasant route to Devils Dyke and the South Downs. Has anyone walked this route recently? The area is sadly neglected and an unhealthy environment. Undesirable litter, flytipping and lack of maintenance is all to blame. No one seems to be responsible for these walks and routes to our countryside. How can Toads Hole valley be any different from Hangleton?

my comments with landscaping are similar to my comments regarding the site. Where will the budget come from to sustain the look of the new environment? Please consider the appalling environment on the doorstep of Toads Hole Valley.

The estate needs to be provided with its own community based facilities and infrastructure. Schools, GPs, dentist, shops and when was the last time a new park was created, which may attract people from other parts of the city to visit

Why not provide a primary school and nursery? it is a fact that there is more car usage with primary school children, so where would all these children attend school and how would they travel there? By Car!

I can't agree with the quota for cars per household? this estate, being a long way from the rest of the city will attract people with cars,

Essential for improved bus routes in the area. How will people cross over King George 6 road?

I feel that this is over development of this land. To achieve the numbers of residential and commercial properties within the site means that the area's density is much higher than that of the adjacent Goldstone Valley and will put huge pressures on the infrastructure, particularly in relation to transport.

The large development of the site will inevitably put huge strain on the transport system within the area. With the numbers of vehicles likely to be accommodated within the area it could lead to gridlock, particularly at the roundabout where Devils Dyke Road meets Dyke Road Avenue. There is a need to seriously review King George VI Avenue at this present time, as this road is dangerous, particularly at its junction with Goldstone Crescent. Adding the numbers likely to use the road by the development of THV, then the road is a disaster waiting to happen. This needs to be assessed in far greater measures than seems to be the case in this report. A full realistic review should be undertaken to ensure that traffic flow and danger to all is minimised in King George VI Avenue. Not enough parking spaces are to be provided in THV. It is laudable to talk of public transport and reducing car use within the valley, but also naive. People will still use their vehicles and the suggested spaces will not be enough, This will inevitably lead to extra overspill parking in the Goldstone Valley, as seen with the case of workers at Legal and General, where minimal parking on site has led to major problems within the area. Take heed!!

I am concerned the proposed development is: 1. out of character with the area with too high buildings for a semi rural site. 2. Insufficient parking is planned which will lead to overspill. 3. The opportunity to improve the dangerous King George V avenue is not being taken. In particular cars find it difficult to keep to the speed limit downhill when approaching the junction at the bottom of the hill. Despite comments above I am in favour of a suitable development but this is not suitable.

Does not address the negative impact on local residents within the vicinity, with regards to vehicle access to the development, noise and air pollution, infrastructure, car parking, nor address the dangerous junction at Goldstone Crescent and King George VI Avenue

King George VI Avenue is a dangerous road evidenced by the number of accidents over the years - the road needs realigning and/or a reduced speed enforced and there should be more screening from the road to reduce the amount of noise pollution. The existing screening is no longer effective due to the large number of accidents over the years reducing their effectiveness.

Does not address car parking concerns of local residents - the development needs to have sufficient car parking for residents, visitors and workers. Where are workers going to park? Local roads?

What steps are the council taking to ensure that local infrastructure eg roads, will be improved as a must do, as opposed to guidance, to cope with such a large development, including improvements to local roads, access to A27 and the dangerous junction between Goldstone Crescent and King George VI Avenue. What steps are the council taking to mitigate air and noise pollution from traffic on King George VI Avenue and/or the A27.

There is a proposed over-development of the site which is totally at odds with the surrounding areas, both in terms of density and use.
Higher structures should be built at the lower end of the site and be as unobtrusive as possible.
No problem with accommodation being built but not business uses.
Is more office space really necessary in Brighton & Hove these days? Please just check the Argus commercial lettings pages, there is office space aplenty already available.
Sorry but all I could think of was 'All pigs checked and ready for take off'. Nobody wants this here.
Where is everyone going to park in this utopia?, not in my road because it's already full up.
There is only one chance to use this space properly. Do not fail to be rigorous in examination of any plans. Do not fall for the fallacy of cosy village type communities because it will not be one.
The danger of overdevelopment is huge, please recognize the dangers.

Within the Community facility it would be good to make provision for it to be used for the spiritual well being of the residents by the inclusion of a christian meeting point and church something on the lines of that achieved at St Richards Church in the Hangleton Parish. Consultation with the Anglean Diocese to see how this could be incorporated should be explored.

Means of access is of crucial importance, particularly in conjunction with the aim of reducing car usage. It is vital that frequent bus services are provided for the new THV site and that this is included at as early a phase as possible.

"4.26 City Plan Policies CP1 and DA7 set a minimum target of 700 residential units to be brought forward in the THV site. This is to be achieved via residential varying between 50-75 dwellings per hectare and a minimum of 50% 3+ bedroom family housing. 4.27 The local planning authority recognises that housing numbers are set at a minimum and there may be an opportunity for increased housing provision which could help create a more viable neighbourhood that supports a variety of businesses and activities and is well served by regular bus services" Given the dearth of viable sites in B&H, only delivering 700 residential units would be a missed opportunity. I strongly urge the minimum target to be raised to the region of 1,250 residential units with the assurance of regular bus services and a genuine new community being established rather than just a housing estate with a couple of local shops. Secondary school provision is welcome and I believe GP services are also essential if there is a minimum of 50% 3+ bedroom family housing. The combination of 1,250+ residential units, a school, frequent bus services, GP surgery, shops and open leisure spaces would create a genuine neighbourhood with its own identity and sense of community. It would allow connection to the rest of B&H without putting existing services under strain.

Linking into public transport absolutely essential. This section mentions "parking provided in connection with a future office use may be considered for informal weekend Park + Ride" - there is an opportunity to be ambitious here and go further. Why not set up a proper Park & Ride which would serve not just THV residents/office employees but also tackle the traffic issues in B&H city centre? We have needed a park & ride facility for some time now and this development is a good opportunity to explore the idea. Reducing car usage will be no more than wishful thinking unless significant provisions are made for alternative forms of transport.

I welcome the building of new homes in a mixed usage design, however with the size of this development I urge the council to be bold and deliver sustainable affordable housing solutions in a way that benefits not just THV but B&H as a whole. I believe this could be achieved by providing: * minimum 1,250 residential units * good bus links to the rest of the city * school as outlined in existing plan * on-site GP services and pharmacy * full-scale park & ride to serve visitors to the city as well as THV residents & office employees Given the numbers of physically disabled people on the housing waiting list, I would also welcome a determined effort to include purpose-built accommodation for wheelchair users, including ramps, hoists and wetrooms. Aesthetic considerations such as the view should be secondary to delivering the above.

While I applaud the concept of making this an attractive, ecologically sound and socially inclusive development in line with the character of its surroundings I see nothing in the language of the document by which potential designers will be bound. The loss of our green spaces is unavoidable but we can surely do more for humans to ensure that the proposed development meets the recommendations as requirements.

Residents will need to be protected from the existing levels of noise on George VI and the A27. Residents on Hilltop, The Heights, the top of Dyke Road Avenue, George VI and Woodland Drive will also need protection from the increased levels of traffic, pollution and noise. What measures

will be taken to address these?

I see little here that directly addresses issues of integration into the wider context and safeguards the notion of excellence in building design.

Figure 4.4 provides a good example of the poor architectural design and out-of-character nature of this building with its surroundings. It is an isolated example and should most definitely not be used to increase such ugly housing provision. The example of The Hyde again provides an example of unimaginative design, flat boxes - does anyone remember the 1960s? The notion that housing design 'should consider opportunities' (4.30) needs to be turned into an imperative. The suggestions to cultivate social inclusion of all kinds is laudable - but will it be delivered? what guarantees can be made? and indeed sustained?

Some thought needs to be given to the likely type of residents attracted to such a development. I would suggest that there will be a high proportion of people who commute to work and opportunities for communal leisure might be hampered. Examples of what might encourage people to stay and invest in time and neighbourly relations need to be given which are more persuasive - it may well become a bland housing estate. If the transport connections are so good why wouldn't people opt to go into Brighton centre?

The comparison with Jubilee Square is extremely disconcerting - most inappropriate for the edge of a city. Greenery is essential - concrete spaces invite vandalism. Care needs to be given to thinking through the realities of living in such spaces and night time security.

The number of proposed dwellings is far too high for the land base. 50-75 dwellings per hectare will result in crammed-in housing with little garden space which is antithetical to the existing area which not only supports well landscaped individual residential housing surrounded by green spaces (Green Ridge and the Copse) but abuts the National Park. Development needs to be in character with the surrounding and not a sudden jolt into an extreme urban landscape more suited to the centre of a city.

In principle, this is a sound idea but the to-ing and fro-ing of vehicles to the workshops needs to be considered intelligently. Similarly the design of such workshops needs to be attractive - not more box shaped units of a brutalist aspect.

The provision of educational facilities for the proposed residential development (but do flats necessarily attract families with children?) is welcome as is the idea of opening out to a wider catchment area. However, the issues of pedestrian safety and transport access need to be addressed imaginatively. This issue is of course linked to concerns regarding the consequential rise in numbers of vehicles belonging to the new home owners.

Obviously such a large residential development will have need of nearby shops and the like. What guarantees will the council and developers provide to ensure AND maintain their occupancy by independent businesses rather than the bland development such as at the Marina where corporates have killed off any individuality and potential attraction for clients to use the facilities. This sounds good in principle - but the detail is lacking.

This is one of the most worrying aspects of the proposal. Having lived at the top of Dyke Road Avenue adjacent to the cafe for almost 20 years we have been constant witness to the increasing build up of traffic which now exists as a grave cause for concern. The volume of noise and more particularly high levels of pollution at peak times, especially when traffic queues to get on to the roundabout is already problematic. Getting out of Hilltop is hazardous turning both left and notably right across the fast moving traffic coming off the A27. The proposed addition of c. 700 dwellings each with at least one car (remember that most homes now have a minimum of 2 cars) will contribute to further traffic jams and pollution. Plans to offset this deterioration in traffic control need to be finely developed well before any decision is reached.

Any genuine strategies to 'soften the built up edge' of the new development are to be welcomed. But beyond that suggested here surely it is evident that high rise flats are not the answer to the use of this land.

Phasing will be essential in further developing what is already a major communication hub in and out of Brighton. I trust that due consideration has been given to the likely impact on ground water in the area.

I would like to see more detail on how nature conservation will work given the scale and density of this proposal.

This site would be better served by the building of houses surrounded by gardens in a more suburban style to match the majority of the existing developments of the area and the adjacent National Park.

The outline reads well but there is a lack of detail especially in relation to the transport links and

changes to the existing road network

Recognise the needs of a new community and providing a focus. Not just one pick up for the buses and also need to recognise the slope of the land and need for a number of stops up the hill. Have there been any questions asked if a potential GP practice would run the new surgery? Need for truly affordable housing, ensure 40% figure and also need for Social housing as part of the development.

not sure if offices are best business development other than a potential business Hub with office space available for small businesses

original design was for a secondary school, question the relevance with regard to demand in the area and also the need for good transport services for any school.

need for good community facilities, local shops, and community facilities, enhancing the provision at the top of the west hill at Burwash road.

The proposals to use George VI Avenue as a bus route is anon starter due to the gradient, potential with new roads to have buses that link up with Dyke road as well as coming into Hove. Need to ensure that the bus company would provide a good service to Hove and Brighton to reduce the car usage into the city centre.

potential to create new nature reserve on west hill and direct access to the SDNP with bridge or tunnel over / under the A27, possibility for co-operative garden growing and vegetable patches alongside community open space

fully agree and ideally put infrastructure and roads in place for the whole site and then infill with housing and commercial

Many of the images in the report are irrelevant would be better to have computer generated images of actual potentials for the site rather than something that someone has produced somewhere else

I believe that there should be more emphasis on affordable rented accommodation that should be a mix of publicly owned local authority property and housing charity/association which cannot be sold off into the private market. This is an opportunity to redress some of exorbitant property costs on the area.

I would like to see the amount of green space doubled to 5 hectares, this is still a small proportion of the overall area. The area surrounding the development is nicely proportioned with grass verges in areas which contributes to the character and feel of this part of Hove and is one reason why people like to live in this area. This should be maintained in any news development.

There is no reference community safety and crime prevention, design can enhance the safety and feel of an area, open clear spaces with good visibility can enhance an area and prevent crime.

Clustered developments with warrens of hidden alleys and multiple access routes can make people feel less safe and not part of a community. People should be able to interact with their neighbours easily with common open areas available

Car parking blights all neighbourhoods. In Hove many residents have driveways and this remove vehicles from the road creating a less car dominant feel. It is essential that more than adequate car parking facilities are provided. This could be underground multi story style as long as there is security and safety built in. This means lighting, open design with good visibility CCTV. Crime prevention should be near the top of the priority list for parking with safety. Get the cars off the streets where possible by providing dedicated parking that people want to use. This could be allocated spaces with mixed guest areas etc. Restricting parking spaces will not encourage people not to own a car it will only cause parking mayhem.

Tall building will dominate the view and will give a sense of metropolitan/city living which is out of character with the local area. People like to live in suburbs like Hove for a reason, one of the factors is the contrast with city life that many people have to endure at work. I believe a cap of four stories is more in line with what is acceptable here. Compensate by creating safe underground parking and other facilities such as refuse etc.

Snaky Hill must be looked at. It is already a very dangerous and congested road. How residents of the development will cross this artery is a serious consideration. Peak time traffic is already bad adding several hundred vehicles to this mix at rush hour will be a disaster if not designed and executed well.

Improving accessibility is key. The junction of the top western end of Dyke Road Avenue linking connection to Kind George V1th and then on to A27 is currently not fit for purpose. This would have to be addressed either by underpasses or overpasses to ensure that traffic leaving the city can get away without being caught up with local traffic.

Traffic noise will be a huge problem. More tree planting will be necessary and certain road surfaces influence tyre noise so attention must be paid to mitigating the situation. Road noise influences housing desirability and selling-price.

A sustainable transport network has to take into consideration that not everyone will be on a bike or taking the bus on all journeys from this new site. Therefore the infrastructure around the area has to be developed to reflect this or access to the site will continue to be in gridlock.

A low parking threshold of 1 space per unit and ½ for visitors will cause overspill into neighbouring areas.

If the development of a citywide school does not take into consideration the parent/car situation and provide adequate access at several points, say lower King George 1Vth and A27, then school times will mix with commuters and exacerbate an already choked road system.

At a time when the council is withdrawing resources from numerous social hubs and agencies the sustainability and independence of any 'neighbourhood centre" will have to be implemented. If there is to be play equipment there would have to be a maintenance contract and funds would have to be identified for it to be preserved in the future. Hangleton Community Centre now seems isolated from the surrounding residential area and the greenspace is uninviting. To be an integral part of the community, houses and businesses need to be designed as part of the greenspace network.

It is admirable that the proposed housing and businesses are be so diverse. However, with the elderly in mind again the estate must have several points of access, particularly from King George V1th Avenue lower end to accommodate the emergency service vehicles, so that they can avoid the major artery roads.

Business Parks in B & H are generally speaking concrete blocks with little design concept. As the proposal is to be sited near or on KGV1 then good design is essential. Parking for loading etc should be at the back not fronting the highway to blend in with the surrounding area and character of Goldstone Valley.

Improved links for access should be top of the list.

Links from the proposed development to the National Park, Green Ridge and Three Cornered Copse, should all be made more easily accessible. Currently TCC cannot be accessed from GR although they are directly opposite each other, without crossing the main Dyke Road Avenue which is dangerous as there is no formal crossing. Overhead crossings or lights need to be installed to facilitate access by pedestrians to all these greenspaces. Currently joggers take their lives in their hands are having to negotiate two main roundabouts with no pavements to get to the National Park and the Downs beyond.

If housing provision exceeds the minimum 700 units travel in and out of the site will become greater and the steep and proposals for the dangerous KG1V road are minor adjustments ie. central reservations and crossing points to change driver perceptions and behaviours. Re-routing of KG1V must surely be looked at.

Agree with all this. Careful planning for the design of the network of paths, roads and open spaces is key.

That a Masterplan be fully in place and no piecemeal decisions made is imperative.

Realistically this will be a much needed site for housing of mixed use. Whilst Nature Conservation and the Biosphere objectives are rightly to the fore, the people moving here will be more interested in how they access other local amenities and stay connected to the city of B & H. Portslade and Hangleton currently struggle to feel part of the city and it is important that this development does not feel isolated or ghettoised therefore ALL transport links are of supreme importance.

Traffic congestion is already a big problem in the area. With high density housing planned for the site, this situation will worsen. This site is too far away from the town and while it's sounds good to have a community centre and a few shops it's will not be adequate for the numbers living in the area. How often do you go to your local community centre?

I agree housing should be built on this land but not the planned high density housing. It would be better to have family homes and not flats

Traffic to and from goldstone valley is already a problem every day and this will be made worse by having a 3rd senior school within the build. Too many parents Drive their children to and from school making getting around impossible. Hove park and the three cornered copse areas are heavily used and are relying on volunteers to maintain these green spaces, with a larger population these spaces will be used even more requiring more maintenance and money spent on these spaces. Why not visit hove park early on a Monday morning after a hot weekend when the bins are overflowing and bags of rubbish left by visitors have been torn open by foxes?

Community centre is planned and a few shops, this does not make a thriving neighbour hood centre and it won't be enough to entertain young people living in the area.
Have already said too many units in a small space. Not enough from residents to do.
It would be the third senior school built within 2 miles. Already too much traffic and too many parents driving their children to school. A traffic survey is needed on a school day and a non school day. The difference in traffic volume is huge
The roads are unable to cope with current traffic. Current doctors surgeries are closing and unable to cope with patient numbers. How will new ones open? Maintaining the national park and other green spaces will become a big problem.
Too many residents in a small space. Housing should be more suitable for the area not high density.
What are the bus routes we currently have? The roads within the area don't have the capacity for further bus lanes. There are many cars parked on roads and this will increase

Two main concerns about volume of traffic created as a result of the development and how this will effect Hove Park where cars regularly speed. Parking for dwellings seems inadequate. A 3 bedroom dwelling needs two car parking spaces - its unrealistic and naive to think otherwise. We already have a parking issue in the area driven from businesses in the goldstone valley and that the driveway is the first free parking or unrestricted parking out of the city on dyke road avenue. Secondly the proposal of dwellings of seven stories is out of keeping with the area. With the exception of a few buildings at the bottom of king george vi avenue there are no buildings over four storeys. Because of the topography of the parcel of land tall buildings will destroy the border with the SDNP. Along the a27 there are very few buildings of this nature - not until you get round to the university and the stadium which is generally a more industrial built up area.

Attention should be placed on a high quality development which needs to be appropriate and of a pleasing design to fit in with the local area and should work on the lines of a 'Garden City' (the Town and Country Planning accepted model) - since it has all the advantages of being placed on a greenfield site - only cut off from the wider downs by the A.27. Maintenance, accessibility and social needs require thought early in the planning process. The SNCI site should be the last part to be messed around with- as existing trees and vegetation will be providing cover for wildlife habitats and will also provide refuge for other species once the site is being developed. ie - nesting places for birds etc . This should be sectioned off from the rest of the site by a fence - which should have holes at the base to let creatures escape. 106 monies should ideally be made available early on for a wide GREEN grassed over bridge over the A.27 or at the very least there needs to be a tunnel/tunnels through to the SDNP under the by pass for wildlife needs.

The steep contours will be difficult to manage and provide an architectural challenge which if done well can enhance the slope of the down and maybe provide a stepped effect. Buildings should be carefully placed to prevent destruction of the Downland landscape. An adequate Environmental Impact Assessment (EIA) needs to be put in place to ensure correct identification of wildlife (to include both flora and fauna) is carried out and treated with as much respect as possible. Serious challenges are posed by the site location -which is isolated from both its neighbours living up George VI Ave. (by a dangerous road) and at the top from the Hangleton Estate (by the steep SNCI slope)

Look at Garden City development requirements - as laid out by Ebenezer Howard and Raymond Unwin in the 1900s. Consult 'Habitat and Protected Species Act '

It will be up to the Planning section to monitor applications here to make sure they are of the right type and placed in a suitable location. The active co-operation of the land owner with the council and potential developers will be of paramount importance in future ventures if this project is to be successful.

This is a very large site but building will all be taking place on a slope, so attention should be placed on enhancing the look of it to FIT WITH THE SLOPE - rather than placing tall buildings at the base or at the top. If there is to be a school, the grounds would ideally be placed next to the SNCI area to make sure it is not shaded by development and to keep open spaces adjacent. It is my opinion that 700 houses should be the MAXIMUM rather than the minimum given the consideration of all the other buildings and facilities required to make this an attractive neighbourhood. The placing of these should be decided from the start rather than taking place piecemeal as development proceeds. Essentially existing views both into and out of the SDNP and towards to sea need to be kept. Attention should to be placed on where the best views can be attained - prior to giving any planning permission.

These should fit in once the development type has been ascertained and at this stage should be flexible. Maybe cater for a local workforce rather than one imported from the outside to keep car travel to a minimum

A school is essential if this community is to be self sufficient - this could also serve as a meeting place outside school hours. It will also be necessary to keep traffic away from the dangerous George VI Ave road at peak rush hour times

A meeting place/doctors surgery will be essential for making this development self sufficient and reducing need for cars to go and find these facilities elsewhere. Probably local supermarket stores (Tesco/Sainsbury) would be able to trade rather than private individuals. Maybe a takeaway. Suggestions to make this development self sufficient will reduce the need for cars - a difficult point in a water catchment area. Ideas for special surfaces to mitigate leaks through the chalk would be welcome. Biodiversity gain should be maximised on this site with regard to the EIA , and this would include attention to wildlife corridors - maybe leaving the steep bank up to the A 27 as a wildlife corridor ?

This is going to be a tough problem to solve since only George VI Ave. (a dangerous, busy and twisting Road - nicknamed Snakey Hill) would currently serve the new development. Car travel needs to be kept to the minimum on an already busy road and in a water catchment area. This will be difficult as those who would wish to live here are in easy reach of the A27 but not anywhere near the centre of Brighton or Hove. Current bus services would need rethinking as totally inadequate.

It is probably early days for deciding on networks of paths which will be required to fit in with the inside needs of this particular development

Firstly the area is a greenfield site and should be respected as such - up until the SDNP was declared it was an AONB and therefore thought to be unsuitable to be sacrificed for urban housing. In fact it was once in council ownership after the downfall of the West Blatchington Estate and only by being sold off into Private ownership in the late 1930s was its fate sealed - as descendants of that family have been awaiting their opportunity. Great sensitivities must be shown towards what this site is now.

This does have potential to provide a showpiece BHCC could be proud of - but there are many pitfalls to be overcome - not least that of transport. The surrounding areas are in the suburbs where cars are generally more acceptable, rather than if it were being placed in a more central urban location. A lot of work and thought still needs putting into this project. Concern for existing wildlife is of paramount importance for this greenfield site - currently supporting a regenerating native forest. At a time when the council countryside policy is not to take out any trees unnecessarily - is it not possible to only take out vegetation as and when necessary (because of Ash die back etc.)? - so that some of these trees can form the basis of the 'Garden City' development . ADEQUATE resources must be ploughed into this development from the offset. The Planning section should be liaising with Mr.Larkin (conservation manager BHCC) over the LWS - as this is a council designation to protect wildlife - also it is suggested getting the Sussex Wildlife Trust on board - in the absence of a BHCC ecologist - or consulting with Kate Cole - the ESCC ecologist. This should be done as soon as possible to make sure the site is kept intact while development is taking place in an attempt to minimise disturbance. At the very least the SNCI wildlife site should be highlighted & used as 'compensatory greenspace' with the Countryside team talking with the owner for the best outcome-and to maximize its potential value. Although the site has been neglected it still has value and getting a local wildlife group up and running to look after it again (Historically one did exist years ago but was banned from the site by the owner) would be the best way forward

It is delusory to suggest that the site is suitable for development without RADICAL infrastructure change.

No foresight went into this at the time of the bypass construction.

... gobbledegook cut and pasted from planning policies.

Two noisy roads... research shows that noise is a major stressor of modern life.

Building offices would at least keep the noise from the A27 down for those in Goldstone Valley..

A community is more than something based near a focus.

5-10 shops is not viable. Parking for the shops will be needed: nobody walks around here, they are mostly too lazy or too old to manage the hills. What is vibrant please? Another cliché.

Prithree what exactly IS "sustainable development"? Empty buzzwords. Badger crossings, tree planting and untended scrub for wildlife please, if you must do this.

... sustainable again. No transport is sustainable; it all uses fuel and materials. Fuel usage on this

steep hill will be excessive. Access to Snaky Hill is deadly already. Demolition and replanning at the valley bottom is the bold way forward, but it'll cost...

Dark skies? Tell the locals who are lit up like Christmas trees at night, with wasteful outside lights. No more skylarks...

I'm losing the will to live.. experience shows that nice things are built in, but then nobody looks after them, usually by reason of cutbacks.

I regret to say that this is a disappointing and often semi-literate document that is trying to be all things to all men. You cannot squeeze everything into this site that the document seems to propose. Do not misunderstand me: I don't want it developed, but I understand that state pressure and shortage of living space seem to make it inevitable. It's not suitable for living in, due to the topography and the noise levels, and commercial suggests itself to me as the best option.

Transport links? too much traffic to access Pollution Sewage /water capacity Noise

who is bidding for the construction should it go ahead

Noise built on slopes - chalkland area of natural beauty

volume of traffic at a very busy area already

do we need more empty office space

we do need a new secondary resource

?????? leave [Environment] alone

flooding occurs in this area - will this be a problem?

too much traffic there already - concern about pollution for children and adults living near the A27

A Doctor's surgery is mentioned in 4.40. So much more is needed. This community needs a health centre, purpose built with adequate space to allow provision of a wide range of essential community and voluntary service health and care services. A pharmacy is also essential.

The travel section of the draft SPD shows a distressing lack of ambition and foresight. At a time when car usage should be discouraged, this proposal presents buses as the only alternative to car use and the buses are already hopelessly slow during peak periods. (I commute from nearby by bicycle and the bus always takes at least twice as long as cycling in my experience.) The site is not City centre and realistically very few will walk or cycle into the city centre. Please can we have some bold thinking - this fine City deserves better. I would like to see a tram, monorail or light railway solution. I know that whenever something like this is proposed a queue of people forms to say why it can't be done, but it is time planners and the Council started finding way to do something bold like this. If we don't do this then we have made no progress from when the Hangleton Estate was built 60 years ago and based entirely on the assumption that residents would use cars to get everywhere. Have we made no progress?

Objection. Lets concentrate on the estimated one in every 30 empty homes across Brighton and Hove about 3800. Finding the proposed 700 empty homes that can house families surely this is the way forward? Keep this undeveloped site as it is and don't let Goldstone Valley get swallowed by this high density unnecessary development.

Not enough green and non developed space.

All undone by home owners having multiple cars, pouring out onto the already busy Goldstone Crescent and surrounding area. The area cannot cope with any additional cars.

Objection to the development as mentioned on previous points

The categories above are too all encompassing and the content too vague to enable me to make specific comments. I await concrete proposals on the proposed layout of the site and the access roads. There is substantial development planned for Hove and this should be considered in conjunction with Court Farm House and Sackville Trading Estate rather than in isolation. It is inevitable that Toads Hole Valley will be built upon and the hopes for the development and its residents are admirable, but the effect on Hove and Hangleton is not satisfactorily addressed. Hove is a suburban areas and should not be treated as urban with traffic continuously passing through it. Constant traffic noise, pollution especially the rise in particulates, street parking choking some roads and speeding are getting worse and these developments will exacerbate things. The new development will need to exit onto the bypass rather than onto King George VI. Whilst playing in the street is planned for Toads Hole residents, it is impossible for any other Hove residents and matters will get worse without much more careful planning. What we do not need are wider more 'developed' roads. The suggestion that the new development should have an urban feel is a mistake. Hove and Hangleton were built in the 1930s and are of a fairly uniform design. The

Brighton Station site is ugly, dirty and poorly constructed - fast becoming an eyesore - and many of the stark redevelopments of houses in Hove are rapidly degrading and out of keeping with the original houses. This is poor architecture and planning officers need to be more demanding. The suggestion that businesses should front King George VI will turn that road into an eyesore and certainly not a conduit into the countryside. Finally, Hove is bankrupt culturally. Everything takes place in Brighton or in a small number of places on the outskirts such as the Dyke Road theatre or King Alfred. Where is the cinema or a sense of community? This is why all the proposed developments need to be considered as a package and planners need to include the effect on all residents and make sure their needs are properly catered for.
I notice the figures for noise levels at junction in the area are already high.

I have concerns regarding 2 issues. The issues around King George VI Avenue and the building of units 3 metres from the road (your spelling of meters accepted). The open ended number of dwellings shown as a minimum of 700 units

All appears reasonable. Difficult to see how the sight lines showing building heights below the crest of THV on King George VI Avenue will be maintained if buildings are to be located 3 metres from road

Good to see local and national policies laid out

Will look forward to seeing more definitive plans of building types, heights and locations

The issues relating to buildings 3 metres from the road - King George VI Avenue - height, siting and mass appears to conflict with the design ideas. Are these buildings going to be 1,2 or 3 storey units. Will they in effect make a wind tunnel, will they channel noise from vehicles accelerating / climbing the hill. Will they detract from visual experience looking towards the sea when travelling downhill and SDNP traveling up hill. Is it not possible to green this route in a manner similar to the Hangleton Link road and provide numerous broadleaf and evergreen trees?

No issues with this area.

Accepted the site needs to be viable. Query maximum numbers to be built. Location of business units.

Accepted that this should be included in the mix, the location and type needs clarification.

Accepted as part of development

No issues with this element.

Welcome new energy initiatives

For me [Transport and travel] is the big issue. What are the plans for King George VI Avenue. Will it be a dual carriageway, will it be 'bridged' to provide pedestrian access. Are there plans for the intended offices / houses 3 metres from the road to have a service road. Will the speed limits be reduced. Will this affect fire hydrants and drainage on the road. What environment monitoring will be in place during construction phase? Will HGV traffic be rerouted through site? Will there be dust control measures in place during construction? Will they be monitored and will there be penalties for exceeding limits

No issues with this area of the SPD

The master plan needs to be clear about roads, access and how the increased traffic will be accommodated. King George VI Avenue is a dangerous road and very congested early morning and whenever incidents occur on A27(T) and Dyke Road Avenue. Building units, residential or commercial 3 metres from this road will add to pollution in terms of air quality, noise and light pollution. How will increased traffic affect the A27(T), the slip road tailbacks at times back up onto main carriageway especially morning and afternoon 'rush hours'. Will accident rates increase. Has the response to Highway Agency concerns been included in master planning - will they be published?

No issues with appendices

Minor point. Documents should be proof read before publication. Meters / metres. Breaking / braking. Small errors but reduces professional presentation.

The environmental impact during construction needs adequate control, monitoring and where necessary, enforcement. The environmental aspirations appear good.

The SPD fails to address the problems that will be caused at the dangerous junction at the foot of King George VI Avenue by the increased usage and complexity of road usage caused by the development. The measures included so far to slow down traffic with pedestrian and bicycle crossings might be useful but do not remove the dangers at the junction.

I welcome ANY development that encourages a socio economic mix with sustainable and

TRUELY affordable family sized housing in communities as at the moment local young families are being priced out of the city they grew up in.

Anything that encourages social equality and a broader social mix is a massive positive.

The homes need to be family sized and be truly affordable for local young families x I really hope the development happens quickly and goes smoothly as Brighton and Hice is crying out for homes and what a wonderful community it sounds like it will be ! What more could you want ? Can I live there please ! !

Highest level of nature reserve and space should be adopted - encouraging meadows that sustain butterflies and downland flowers and wild life

As above strong elements of the Downland should be incorporated into any scheme.

Strong use of renewable technology and low impact buildings - like underground grass-covered buildings - not modern estates that will take away from the Down land elements of the site.

Again Eco - sustainable part underground dwellings using renewable technologys

Something based on the Fisher Pavilion in Seattle - built into the landscape with grass on top for social outdoor events with a communal space below

The hyde in Kent looks a great design - but outdoor space must be maximised with meadow and down land preserved

Underground office space

I grew up in the area and local schools could be expanded and meet the need

These should be integrated with the community centre - develop the shopping area in Burwash Road and Nevill Road

Meadow and Downland must be preserved - with any Badger dens being moved and not destroyed as happened in the building of the bye pass

Car use must be limited as much as possible to stop the destruction of downland

Must preserve the natural meadow and download and not create urban areas that don't encourage local biodiversity - butterflies - birds and small mammals

This site has always been open downland through my life - it has been neglected since the bye-pass cut through it. I would personally love it to be a nature reserve. Hangleton deserves a green space that would encourage wildlife and could be a safe environment for families to use and learn about the downs. If these plans go ahead they should be as low impact and sustainable as possible. Avoiding profit over affordable living and not overcrowding. With a space to promote and encourage sustainable living alongside ample meadows.

Leave it as it is. No further development is necessary in the overall area. Let there be a place of nature. The city is already full up.

As a resident who lives extremely close to this proposed I extremely alarmed that this development is going to be quite large, much larger than I imagined and yet there appears to be no plans to alter King George V1 Avenue. It would appear that the houses are going to be very crammed to maximise the amount of housing planned yet it seems as though not enough parking on the proposed site has been allocated.

Toads Hole Valley is in a "bowl" like environment. It tends to flood when there is heavy rain, even now and the dip in King George V1 Avenue is often flooded with rain water during persistent bad weather. This road also is extremely dangerous and there have been many many accidents, some fatal, over the years. On 27th April recently, there were two in one day, one down the bottom and one at the top. In the winter the road is dangerous when it snows and is often blocked and inaccessible. I have lived here for over 40 years and have witnessed many people who have had to abandon their cars and walked. Two people I have recently met who live in one of the roads off Queen Victoria Avenue and whose garden backs onto King George V1 Avenue found two dead people in their back garden a few years ago after one fatal accident in the winter on this road. I therefore it is totally irresponsible to plan such a vast development without putting in sensible plans to the main road which is very heavily used as a link to the A27 and A23 and in its present form, is already very dangerous.

I am absolutely amazed that no sensible infrastructure seems to form part of the development, schools, libraries etc and also no public transport links. Our present bus service is very poor and due to no plans for King George V1 Avenue, I am unsure how this would be linked to the development.

I would not want to see any tall buildings in this development. The area is one similar to a nature conversation site and it would be a great shame to have a severe blot on the landscape by

introducing tall buildings, I would also not like to see housing too close to the boundary of King George V1 Avenue.

As a resident living very close by, any facilities that were being built would generally not attract myself or most of the other residents living in the Valley. There are already plenty of these in Hove which are already very accessible.

We pay a premium to live in this area and I would not like social housing too close to my home. This isn't for any other reason other than I would worry about the current value of my home declining and this is a concern for lots of us living in this area.

I am definitely not happy about office space being built in Toads Hole Valley. With no new planned route into there, it would only increase the already heavy traffic there currently is and create road safety problems.

I accept that the area would need a new school if this goes ahead

None of this is possible without sensible plans put in place for King George V1 Avenue to be altered or a new link road put in place somewhere.

I would suggest that housing is built at a minimum and that very large areas are kept as green space.

The only buses that serve this area are 21 and 21A in Goldstone Valley and 5B for Hangleton. Without sensible alteration to King George V1 Avenue, I do not understand how any bus links can be put in place as there appears to be no plans to how the current services would link up to the development.

I would like the area kept as environmentally friendly as possible and accessible. I am very sure that snow and heavy rain will cause many flooding problems as the site is being planned on a flood plain. This will be despite any drainage works etc due to the actual shape of Toads Hole Valley.

Any form of street lighting in Toads Hole Valley will surely have an impact on the surrounding areas north of the A27 which is protected Green Space and flora and fauna.

Anyone who has lived in Goldstone Valley will be aware that King George V1 Avenue is notorious in its present form and very dangerous. There are repeated accidents, many have been fatal and two in one day recently. In the winter when there has been snowfall, the road is often inaccessible as it is too icy to drive down and too icy to drive up and therefore often gets blocked. I would have thought safety should be paramount and therefore take priority. There should be less housing and a decent road link for access and exit out of this proposed new development to prevent any more fatalities as there have been many on this road in recent years. Just two weeks ago, an air ambulance was called out to one. The roundabout at the top of Dyke Road is very dangerous also and more traffic from the development will only increase the gridlocks that happen during the rush hour and during school times. Noise will be increased and light pollution and I am wondering whether the council will be offering compensation to those householders that are going to be directly affected like ourselves who live directly opposite as this will have a dramatic impact on our lives whilst it is being built and also afterwards?

How will the area of special conservation interest be protected with the increased number of people living in the area? Will there be alternative green spaces for people to use reducing impact on the protected area? Concerns over the finishes on some of the buildings particularly the flats. They look very similar to those at City Point by Brighton station. These are already looking really run down and dirty and unkempt with chunks falling off. I'm surprised that Brighton is proposing more of these ugly buildings. The area in City Point in the plans was shown to be quite green, but the reality was a few small trees planted. What will be done to ensure any development will look like the actual artists' impressions? High buildings block out too much natural light. They should be kept as low as possible.

Will there also be a primary school for local children?

All things suggested in this section are important

How will the area of special conservation interest be protected with the increased number of people living in the area? Will there be alternative green spaces for people to use reducing impact on the protected area? Concerns over the finishes on some of the buildings particularly the flats. They look very similar to those at City Point by Brighton station. These are already looking really run down and dirty and unkempt with chunks falling off. I'm surprised that Brighton is proposing more of these ugly buildings. The area in City Point in the plans was shown to be quite green, but the reality was a few small trees planted. What will be done to ensure any development will look like the actual artists' impressions? Solar panels on roofs to reduce energy impact.

We need more affordable housing. Use the land.

We are surrounded by areas of conservation. Cross the A27 and you'll see miles of habitat nature can move to. We are lacking space for humans to move to. Use this land.

Ensure some of the housing is affordable and not typical BN3 price tag.

Offices should be kept low level ie under 4 floors.

CPRE Sussex Response to the Draft Toad's Hole Valley SPD Consultation This is the formal response of the Sussex Branch of the Campaign to Protect Rural England (CPRE Sussex / CPRE Sx) to the consultation on the draft Supplementary Planning Document (SPD) for Toad's Hole Valley. CPRESx works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities. The Brighton and Hove City Plan Part 1 assumes less than half of Brighton and Hove's Objectively Assessed Need' for housing can be met and this clearly puts pressure on the surrounding countryside to meet this Need' (or Demand' to be more accurate) for new housing. For this reason, we would generally advocate higher density development within the urban environment. However, we also believe that good design is essential in shaping places where people want to live and will enjoy living and welcome the recognition that The creation of a vibrant, attractive, accessible new neighbourhood that people want to live, work in and visit is the ultimate aim of City Plan Policy DA7.' The drive to achieve housing numbers should not compromise place-shaping. This urban fringe location is a transitional buffer from the built environment to the open countryside and is sensitive in terms of hydrogeology, ecology and landscape. The site should act as a Gateway' to the National Park. The SDP recognises the challenges' of developing this site. It is important that the SPD does not become a wishlist' and the language of the document should reflect this. For example, it should be a requirement, not a recommendation, that a masterplan for the site including design codes, is prepared and that development proposals are subject to community consultation prior to submission to the Local Authority for approval. This would be supported by NPPF para 66 (Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community.) This development offers many opportunities and it is essential that they are realised. Landscape, Design and the National Park We welcome the aspiration of high standards of sustainable design, including low and zero carbon decentralised energy and agree that it is vital that these issues are addressed by the design team from the outset. In addition to this, we feel that the SPD should incorporate more detailed guidance and context for a sensitively designed landscape-led development in the context of the setting and special qualities of the South Downs National Park. It should also give more consideration of how the scale and massing of buildings will impact on the SNCI. In our view, stronger guidance would support innovation and not hinder it. Affordable housing is vitally important for the city and CPRE Sussex would like to see greater emphasis on the requirement that 40% of development on this greenfield site is for affordable housing. We would not like to see a repeat of examples such as the strategic site north of Horsham, where the council's affordable housing target is 35% but Liberty Property Trust have recently amended their application to provide 30% housing for local needs' " of this only 12.7% would be affordable rented housing, with 5.3% shared ownership units, totalling just 18% The rest of the 30% would be made up by private rented sector housing, included at 85% of open market value (OMV), and discount market sales. more at: (<http://www.wscountytimes.co.uk/news/politics/revisions-to-north-horsham-housing-plans-submitted-1-7874101>) We support paras 4.22 to 4.25 of the draft SPD in terms of creating a neighbourhood centre to include community facilities and believe that this should be further developed through the Masterplan for the site to ensure that this is an attractive focal point - this may not need to be located in the lowest area of the site topographically. Accessibility Proposals to reconnect the City with the National Park, including use of the route of the former Dyke Road railway are welcomed. We still have concerns however about the KG VI Ave as its steep gradient makes it very difficult to adhere to the speed limits on the descent and increases air pollution and potential congestion on the ascent. Adopting physical measures such as central reservations and crossing points could exacerbate this. Wildlife We are very glad to see that the SNCI is not included in the developable area for the THV site and agree that its retention would provide manifold benefits with sensitive management and utilisation. The woodland bank area provides a rich habitat for wildlife. We would like to see further guidance about how the site could be managed, and any legal agreements for maintenance, linking to the Sussex Wildlife Trust, including provision of wildlife corridors and other methods to mitigate the impacts of development

on wildlife once construction commences. We agree that that the steep slope along the A27 “ which could act as a landscape buffer strip - and other areas of the site that may prove unsuitable to accommodate development provide opportunities to further increase biodiversity gains. Green underpasses or bridges could enable wildlife to travel across the A27 to and from the national park.

it is not clear to residents of the vicinity why there are commercial facilities proposed on this site. This is out of keeping with the neighbourhood and will deprive us of the residential amenity we have. The proposed density is double that of the neighbourhood residential density around the site.

The site is on a steep grade as is the road alongside it. It is flanked by the bypass. 1. Concerns about the ecological impact: There is an SNCI next to the site which will be impacted by the development. 2. Traffic impact due to the site being boxed in and no potential for cross roads. 3. Snaky hill is unsafe already. The traffic caused by such a high density proposal will have a further adverse impact

1. The South Downs National Park and the Downs are visible from Snaky Hill and from the residences along it. As one drives down the road, one has a beautiful view of the South Downs. The visual amenity of the area lies in its openness. The air and view will be impacted by such a high density development. 2. Sustainable Transport: the bus links in our neighbourhood are not good enough. The Council does not control the bus company. The recent developments have increased traffic. Office commuter share parking in our street as the council mandated a low parking ratio in the office buildings. The bus routes have not been increased. Such a high density proposal will have a further adverse impact on our residential neighbourhood as commuters will drive in from the A27 and park along our roads. 3. There is adequate retail in the city and this is a residential fringe area. This is not the right location for office and retail. 4. Community and sport provision: none of the land is controlled by the Council. The SPD has not mandated any percentage of the land for sport or community use, neither does the Council have the ability to control this due to the ownership of the land. The high mixed use office and retail proposal will have an adverse impact on the neighbourhood and is completely out of character with the existing neighbourhood, in an area that is bordering the South Downs National Park. The density and character should be in keeping with the local area and not adversely impact the character, the ecology and the roads due to the traffic and density.

The neighbourhood needs to be involved in agreeing any masterplan. How did the Council develop the percentage mix of different uses? This has not been through any ecological or transport impact assessment, it seems to be arbitrary. The green space is not enough considering that it is completely open at present and borders the SDNP and the SNCI. The percentage mix of uses should only be agreed after a full traffic, ecological and transport impact study that has consultation with the neighbourhood and stakeholders.

The Grade of the site makes it difficult to have good amenity. Strategic views from Snaky Hill road to the South Downs will be impacted with 6 storey buildings. The massing of such high densities will be out of keeping with the surrounding area. The current density of the area is 37.5%. The proposal is to double this to 50-75%. This is out of keeping with the current neighbourhood and will deprive current residents of our residential amenity.

The pictures in the SPD are of urban centres. This is completely out of character with the existing Goldstone Valley area. The Toads Hole Valley in and of itself cannot make an urban hub. The area around it is of residential character with a density of 37.5%. The proposal suggests a completely different character from that of the surrounding neighbourhood and deprives the current residents of the residential amenity within a green suburb of the city that is surrounded by the South Downs National Park, in a lower density residential neighbourhood.

There is no guarantee that developers of this plot of land will actually develop designs such as those shown in the photos as the masterplan can lay down principles, but there will be no actual architectural control. It is unclear how much of the development will be available for public space and the percentage shown in the land use mix is not enough for a plot that is flanked by the South Downs National Park.

Snaky Hill (King George VI) Road is already a difficult road in terms of topology and safety. I have serious concerns about the levels of office and residential development, as well as retail. Cars will be pulling in and out on Snaky Hill Road as there are no other roads for traffic to enter and exit from given the site is bordered by the A27. Cars waiting on the steep hill will back up towards the intersection with Goldstone Crescent at the bottom and the roundabout at the top. The Council will inevitably not allow for adequate parking within the THV site, which means that there will be cars

parked all along Goldstone Crescent, making it even narrower and dangerous for the residents who find it difficult to enter and exit from their own houses either by car or by foot. Snaky Hill is a dangerous road to have increased traffic on. The scale of offices and retail proposed will ruin the neighbourhood amenity the current residents enjoy. The offices are not going to restrict employment to local residents obviously, which means it just brings additional traffic into the area and makes an existing dangerous road even more unsafe.

While the city needs more schools, the concern is around traffic and parking. How will the parking and traffic for a new school be accommodated with the amount of development proposed?

Concerned about the scale and traffic impact. If the proposal had density and scale of housing to match the neighbourhood then a school combined with the housing might make more sense, if the ecological, traffic and visual impact was reduced.

Concerned about cars pulling in and out of a parade of shops on a road that is already dangerous.

Can the Council guarantee there will be a doctor's surgery on the site, or is this just a suggestion?

It is not clear how the heat network will work. The community needs to understand this proposal.

Concerned about the ecological and visual impact as this plot is on the edge of the South Downs National Park and has the SNCI on one edge.

Developers have not worked with transport operators in any of the recent developments in this area. The bus company is privately owned and has been reducing services. The community has. It been listened to regarding the traffic impact of recent developments and we have commuters coming in and parking on our roads all day rather than using buses and trains to travel to the offices. This plot of land is too far from the train station for commuters to travel by train. It is unsafe for our children to walk on these roads with the increasing traffic.

it is unclear how any of these can be mandated through this process. There has not been enough consultation with the community to explain these.

The Council has not made enough of an effort to consult with the community. Suggestions: Open planning meetings in a local church with Q&A sessions Community representation on planning approval committees Additional consultation Traffic impact studies before this SPD is adopted Ecological studies before this SPD is adopted

It is not clear how one piece of land such as THV can in and of itself contribute to increased use of renewable energy vehicles or sustainable transport use. The reality is that it will attract commuters who will travel to work by car, just like the recent office developments in the area. Any development will adversely impact the environment so energy efficient buildings will only reduce the impact slightly.

I have concerns that the reliance on the existing road provision in terms of King George Vth Avenue will make any development in THV both difficult and dangerous. The existing road is already dangerous and a notorious road. Increasing traffic volume and, introducing new access points for the development will make an existing problem into a danger to the local community and road users.

The access will only be 'easy' if there are changes to King George VI Avenue. Including improvements to the junctions at Goldstone Crescent and Nevill Road improvements to King George VI Avenue must be included in the plan. It is going to be severely impacted by THV development

The Plan states a 'minimum of 700 houses'. A maximum number should be given to avoid the Developers being greedy and compromising the given space.

The heights of buildings must not alter the current skyline as seen from the dwellings on King George VI Drive

There should be an indoor community space as well as outdoor. A space which can offer classes, courses, hire for groups etc. This will enhance the community all year round. Outdoor green space alone is insufficient

All housing requires parking. There must be sufficient parking

Offices will bring even more people into THV. Sufficient parking for all workers is important. The impact on King George VI Avenue is of grave concern. If the offices follow the line of King George VI Avenue, there is the risk that the height of buildings will impact the view of the South Downs from King George VI Drive and this is unacceptable

A secondary school on THV will bring in pupils and staff from areas outside THV. Again impacting King George VI Avenue and the road junctions with it.

Bus route 21 & 21A is already being reduced due to lack of funding. Any new bus routes must not be to the detriment of the current 21/21A service which is essential for the residents of Goldstone

Valley

King George VI Avenue is outside of the proposed development, but must not be ignored. It is already a very dangerous road. This development must consider the transport burden on the road and its junctions. There must be sufficient parking for residents, plus additional people coming into the site such as workers, school staff and children. Transport infrastructure is as important as the buildings and layout.

The basic concepts appear to be sound other than the only reference to the environment, nature and possibly biodiversity is "usable, open, recreational spaces and an enhanced and well-maintained SNCI." An awful omission. Protection of the SNCI is a requirement, but the whole site needs to be considered to strengthen the SNCI. It is easy to use general words to paint a picture, but the success of the eventual proposals will need to be fully detailed with further consultation during the Planning approval process.

The quote "The SNCI has been subject to little if any management over the last decades and in its existing form can be characterised as scrubland: a mixture of trees, grass and other vegetation." must not be used to weaken or dismiss the SNCI. My understanding is that the owners have discouraged access and paid no attention to the SNCI presumably to minimise the impact of the SNCI on any development. It may well be that the lack of care to the SNCI over many years has enabled nature to be even more established and the future necessary surveys as part of the Planning process will demonstrate that point. The topography of the site means that the parts towards the A27 to the north are high with the risk of development being visible and intruding on the SDNP. The astonishing recent approval of the Court Farm proposals are a poor omen for this site in this respect. Links for nature and wildlife from THV to the SDNP should be a requirement. Presumably a development of this size could fund a tunnel under the A27. This could be at least for wildlife and possibly humans as well. There is correct reference to "Groundwater Source Protection Zones" and these are important and must be taken into account. This is not one of B&HCC's strengths, e.g. the Horsdean Travellers' site.

"Policies CP12 Urban Design, CP13 Streets and Open Spaces and CP14 Housing Density and Policy CP10 Biodiversity, Policy CP16 Open Space and CP17 Sports Provision" are key if this THV site is to be designed to an acceptable proposal. I come back to my point about integration with the SNCI. I see a risk of attempts to put everything and the kitchen sink on this site. Proposals for a school on the site seem to have weakened and yet that provided the potential of open space as playing fields or similar, which would also provide community facilities.

This section reinforces my views on the need for relatively low density development to provide the sort of development outlined at the start of the SPD.

I have already covered in general terms. It is not an easy site to develop due to its topography. Low density will be key to its success.

Generally agreed as a desirable concept. I see a school as being a good basis as a starting point. Just what is the proposal in respect of the percentage of residents being employed within THV or elsewhere? Not realistic to expect a match, but it clearly affects the impact the development puts on the surrounding roads etc. How realistic is the provision of a viable neighbourhood in a development of this size? Other examples nationally?

Outlines the challenges in developing this site.

What links will there be to provide direct access to the SDNP? Whilst these are important it must not be forgotten that people need their own park close to and within the area in which they live. The NP and local park are different in nature.

Aims are good, but I remain dubious over such claims and proposals.

"Transport and travel options for the site would need to be tested once the location of land uses (i.e. residential, employment, school, etc.) has been finalised." Agreed, but some emphasis in the other direction would be even better - i.e. design the development to suit the provision of travel options.

Agreed.

Sound concept, but it must be remembered that people will be living on the site as the development continues over a number of years. Very difficult to phase in the infrastructure as development proceeds over a number of years.

No specific comment on these Appendices.

In summary, I would rather this site was not developed at all, but I accept that is a lost cause. I see the key to any successful development is to maintain a fairly low density with the integration of Open Space and the SNCI with community facilities. The once proposed school seemed to provide some hope as a starting point for a community facility and if this falls by the wayside, it is

essential that more residential or business premises are not put in its place. This SPD needs to be strengthened with detailed requirements in the Full Planning Application which must then be enforced and not weakened. A comprehensive formal Environmental Impact Assessment is an essential requirement BEFORE any Planning Application is considered for this site. As you will know it was an AONB in recent years and the important SNCI is still a large part of the site. If this significant THV site is to be developed we must retain as much open space and biodiversity as possible. That would show support for the retention of the Biosphere Reserve.

