



SUPPLEMENTARY PLANNING DOCUMENT
SPD 15: TOAD'S HOLE VALLEY
CONSULTATION STATEMENT

Introduction

This statement has been prepared by Brighton & Hove City Council and sets out the details of whom the Council consulted with following the development of the draft Toad's Hole Valley Supplementary Planning Document (SPD), a summary of the issues raised and how the issues have been addressed in the final SPD. The consultation was conducted in line with Brighton & Hove City Council's Statement of Community Involvement (SCI).

The following groups and individuals have been contacted by the city council for their views on the draft SPD:

- The Public
- Elected Members
- Local community and amenity groups
- Developers and landowners
- Highways England
- Historic England
- Natural England
- Environment Agency
- Sport England
- South Downs National Park (SDNP)
- Individuals/organisations who commented on City Plan Part One Policy DA7 Toad's Hole Valley
- Council, district and South Downs National Park (SDNP) officers, including East Sussex County Council archaeologist and ecologist

The consultation was freely available to all on the Council's website and its Twitter and Facebook social media outlets

How these persons were consulted

The SPD underwent initial issues and options consultation with stakeholders between 21/03/2016 and 08/05/2016, prior to formal drafting commencing. Views were sought of stakeholders from 594 individuals and/or organisations representing different interests in the Toad's Hole Valley area. These included residents and businesses living and/or operating in the immediate vicinity of the site; elected members; community and amenity groups; landowners and developers of the site; individuals/organisations who commented on City Plan Policy DA7 Toad's Hole; and council, district and South Downs National Park (SDNP) officers.

These officers were invited later to attend a design-led workshop facilitated by Design South East (the council's DesignPLACE advice service) and were also

consulted at a later stage prior to the completion of the draft document in January 2017.

The resultant draft SPD was subject to an 11-week formal public consultation between 27 February 2017 and 15 May 2017. The consultations included a press release, advertisement on the Council's website, alerts sent via the council's Twitter and Facebook outlets, a video, emails sent to numerous stakeholders and interested parties, hard copies sent to the Jubilee, Hove and Hangleton Libraries; and elected Members were consulted by email. A one day exhibition in two venues in the vicinity of the site was held on Saturday 18 March 2017 and exhibition panels were displayed in the Hove Town Hall Customer Service Centre between 20 and 24 March 2017.

This consultation statement provides a summary of the main issues raised by those consulted in February - May 2017 and how the issues raised have been addressed in the final version of the SPD. .

Summary of the main issues raised during consultation

A total of 137 representations were received during the consultation period from 115 individuals, 16 from representatives of various organisations, 7 statutory consultees and 1 landowner/developer. Of the individuals who responded, 25 supported the representation made by the Campaign to Save Toad's Hole Valley.

Most responses raised few issues with the content of the document beyond small changes/ minor alterations to various aspects of the document. Some respondents were disappointed with the technical language used in the document and/or the lack of a more detailed design of the development. A similar amount of responses, including all statutory consultees, were broadly supportive of the content of the draft SPD.

Positive references were made regarding guidance that helps to optimise provision of affordable housing; protection of wildlife and/or restoration and long-term maintenance of the SNCI; creation of links to SDNP and neighbouring communities; and improvements to bus services. All 7 statutory consultees (Environment Agency, Highways Agency, County Ecologist, Historic England, Natural England, SDNP and Sport England) broadly supported the SPD with some of them suggesting changes. With regards to masterplanning, a number of respondents gave preference to a garden city/suburb approach to development design.

Of the concerns raised, the majority focused upon the impact of the THV development on the quality of life, road network, air pollution, road safety and/or traffic flow in surrounding areas. The potential overspill of parking on to neighbouring areas, should there be insufficient parking provided at THV, was a particular concern among respondents. Most of these respondents stressed the importance of getting the transport assessment right with many identifying traffic pressure points and times of the day in the network at and/or suggested design solutions that in their view could help to reduce the impact of transport-related issues.

Clear objections to the some or all principles and/or parameters set out for the development site were raised by a number of respondents. The majority of those objected to any development taking place in the THV site.

The landowner/developer objected to the SPD itself on the basis that they considered its content and wording did not meet the legal tests for supplementary planning documents and hence, they considered it unlawful. A number of suggestions were made to soften the language to clarify and reflect the advisory status of the SPD.

Throughout the document some changes have been made to avoid repetition and/or clarify guidance. The main issues raised from the public consultation which were relevant to the SPD are summarised in the following table and are broken down into main section headings of the SPD:

Topic raised	Brighton & Hove City Council Response
Section: About this SPD	
Once in a lifetime opportunity, don't waste it	Comment welcomed. The SPD recognises this and identifies opportunities to meet the policy requirements as set out in City Plan Part One Policy DA7 and the City Plan generally; and signposts good practice examples of how the challenges of the site (topography, access, linkages, landscape impact and drainage) have been addressed elsewhere in the city or in other areas.
[Fig 1.2] map provided not clear particularly with regard to cycling. There is no key/legend to explain the dotted lines.	Comment noted. Map and caption amended to identify train and main road network and include cycle network.
Sites of Nature Conservation Importance (SNCIs) are now referred to as Local Wildlife Sites (LWS) and document should be amended accordingly.	Comment noted. Paragraph 1.7 added to inform the ongoing review of SNCIs and reclassification as Local Wildlife Sites (LWS) that is taking place as part of preparation of the City Plan Part Two
Paragraph 1.10 [of Draft SPD] which states ...: <i>'Once adopted, it is expected that planning applications relating to this site will follow this guidance....'</i> ... should be substituted with the following to clarify document status: <i>'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.'</i>	'About this SPD' section revised to reflect the fact that the SPD cannot be prescriptive but that its purpose is to provide guidance, illustrations and examples which could aid the preparation of detailed development proposals and support the successful delivery of a new neighbourhood for the city.
Section: Planning policy context	
Reference to Application BH2012/03446 no longer needed as consent has lapsed.	Update noted. Reference to this consent removed.

Section: Development response: Submitting a planning application	
<p>It would be helpful to set out the anticipated process/order of play when it comes to landscape impact assessment. That is:</p> <ol style="list-style-type: none"> 1) Landscape & Visual Assessment should consider the site and its wider landscape context and inform layout design, mitigation and opportunities. 2) Masterplan & Vision 3) Design Code <p>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, a 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.</p>	<p>Comments noted. Changes made to paragraphs 4.2 and 4.3 to reflect recommended order of assessment and iterative nature of the design and planning application processes.</p> <p>Reference to Landscape Sensitivity Assessment already incorporated to paragraph 4.6 third bullet point.</p>
<p>It is recommended that design code include the need to reduce light pollution in/around important wildlife areas and green spaces and ensure wildlife connectivity across the site.</p>	<p>Comment noted. Paragraph 4.44, fourth bullet point addresses this issue.</p>
<p>Importance of getting transport assessment right as a means of identifying and managing impact of THV development on quality of life, road network, air pollution, noise and/or road safety and/or traffic flow upon neighbouring areas.</p>	<p>Comment noted. The requirement for a Transport Assessment 'to identify the likely effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use, implementing agreed travel plans and making appropriate contributions towards sustainable transport measures' is set out in City Plan Part One Policy CP9 Sustainable Transport. Given the level of concern raised by respondents in regard to this issue, the Transport Assessment has been placed at the top of the indicative list of assessments outlined in paragraph 4.6 of the SPD.</p>
<p>Paragraph 4.6: it is recommended</p>	<p>Comment noted. Changes made to last bullet</p>

<p>that an Ecological Constraints and Opportunities Plan (ECOP) is produced to help inform the overall design process and that the term “ecological surveys” is amended to “Ecological Impact Assessment” which should be carried out in accordance with British Standards and recommendations for appropriate mitigation, compensation and enhancement made.</p> <p>Paragraph 4.6 of the SPD refers to an archaeological assessment in an indicative list of information required. The SPD should clarify that such an assessment is required at an early stage to inform the nature and layout of any development at THV.</p>	<p>point of paragraph 4.6 to include reference to Ecological Constraints and Opportunities Plan and Ecological Impact Assessment.</p>
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Section: Development response: Landscape-led design

<p>Support for masterplanning and/or design code approach</p>	<p>Comments noted. The SPD signposts the example of the development of and consolidation of a masterplan as part of a planning application for the New England Quarter area of Brighton. In this instance, this approach was quite successful in setting out the design principles and priorities that enabled the development to knit into the surrounding urban area while enabling for smaller parcels of land to be progressively delivered over a period of almost two decades.</p>
<p>Masterplan not appropriate</p>	
<p>The SPD should make reference to Sport England's Active Design Guidance so that applicants might consider it in the early on in the design process. The guide features an innovative set of guidelines to get more people moving through suitable design and layout and 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.</p>	<p>Comment noted. Reference added to paragraph 4.10 of the SPD.</p>

<p>Sea views and/or views across the Downs/SDNP should be protected and, if needed, additional views should be identified and agreed with the relevant local planning authorities early on in the design process so that these can be included in the landscape impact assessment.</p> <p>An application would be supported by an Environmental Statement and could include an LVIA, the Scoping Report and Opinion stage of the Environmental Impact Assessment would be a more appropriate point at which strategic viewpoints can be discussed and agreed with the Council.</p>	<p>Comment noted. Paragraph 4.12 signposts identified strategic views and how these and other view could be used to inform a Landscape and Visual Impact Assessment.</p>
<p>Paragraphs 4.15 and 4.16 specify parameters which include building heights of no more than 6 storeys. Hence, SPD encourages higher buildings (up to 6 storeys), favouring low-rise, high-density options without an impact assessment it is premature to stipulate the heights of buildings.</p>	<p>Comments noted. The SPD refers to what are likely to be the more or less sensitive areas of the site to building height. However, to avoid confusion and clarify these will need to be tested and established as part of landscape impact assessments specific reference to 6-storey height has been removed.</p> <p>Clarification is provided with regards to the potential to maximise strategic views ‘through and from within the site towards the sea and the SDNP’ in the second bullet of paragraph 4.14.</p>
<p>Support for garden city / green suburb approach</p>	<p>Comments noted. The SPD does not prescribe or rule out any particular approach to masterplanning or building types such as those suggested by the respondent. City Plan One Policy DA7 Toad's Hole Valley requires that residential densities fall within a range of 50 - 75 dwellings per hectare. The SPD indicates in the Landscape-led design and Housing sections how density could vary across the site. It considers the potential for higher densities within this range could be achieved where the impact of building height upon the landscape is lower and/or where the mixed use neighbourhood centre is located while lower densities could be achieved in other parts of the site that are more landscape sensitive.</p>
<p>Support for high quality, excellence architecture, building and landscape-led design</p>	

Section: Development response: Place making	
Support for multi-function, easily accessed, safe, mixed use and/or higher-density neighbourhood centre as a focus/for all age groups	Comments noted. The SPD does not require the creation of a new local centre per se. It illustrates how mixed use clusters in the Jubilee Street and Whitehawk-Wellbourne areas of the city have helped deliver land use requirements with a range of Development Plan policies objectives (community focus, housing mix, accessibility and community facilities to share with adjacent neighbourhoods).
Neighbourhood centre not likely to happen/be viable in and/or appropriate for suburban location	
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.	To clarify this intent reference to a neighbourhood centre has been removed.
Paragraph 4.25: the conservation and enhancement of nature should be added as one of the Biosphere objectives.	Comments noted. Change made as requested to paragraph 4.19 of the SPD.
Section: Development response: Housing	
Support for 40% affordable provision	Comments noted. The 40% target is set out in City Plan Part One Policy CP20 Affordable Housing.
Support for variety of housing types and pricing to include first-time buyers, houses with gardens and/or local people	Comments noted. City Plan One Policy DA7 Toad's Hole Valley requires that a minimum of 700 residential units are delivered, 50% of which should be 3 bed family accommodations. Paragraphs 4.28 to 4.30 refer to City Plan Part One Policy CP19 Housing Mix for the remaining 50%, stressing the importance of a wide variety of housing types and tenures to be delivered in THV in order to create a diverse, sustainable community supported by a range of different lifestyles and incomes.
Concerned about density/height/numbers in THV	Comments noted. City Plan Part One Policy DA7 Toad's Hole Valley requires a minimum of

being not in keeping with surrounding neighbourhoods	700 units (50% 3-bed family units) with a residential density range of 50 - 75 dwellings per hectare. The SPD suggests it is possible for density to vary across the site depending of a number of factors including impact upon the landscape. It suggests that higher densities within this range could be achieved where the impact of building height upon the landscape is lower and/or where the mixed use neighbourhood hub is located while lower densities could be achieved in other parts of the site that are more landscape sensitive. The SPD also provides examples of estimated residential densities in existing areas and recent development in the city.
Proposed density seems too low, more housing needed in the city	
Support for higher density and/or housing numbers including as a means of provision of better (bus) services	
Concerned about lack of space standards in SPD	Comments Noted. Space standards are set in the Technical housing standard – nationally described space standard guidance. Adopting these standards through local policy is being considered as part of the work on City Plan Part Two.
Section: Development response: Community and retail	
Support for community/SDNP facilities and/or surgery	Comments noted. City Plan Part One Policy DA7 requires that a multi-use community facility to include a community meeting place and a doctor's surgery is provided as part of the new neighbourhood. Paragraphs 4.32 and 33 of the SPD identifies opportunities for achieving this and other Development Policy objectives
Support for church and/or religious facilities on site	
Section: Development response: Environment	
Support for high standards of sustainable development in general and new energy solutions/building design in particular.	Comments Noted. City Plan Part One Policy CP8 sets out sustainable building standards that will apply to the site. The Environment section of the SPD suggests how these could be combined to deliver exemplar sustainable development.
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 should reflect this caveat.	Comment noted. Caveat added to paragraph 4.34 in the form of 'subject to viability and deliverability'.
We would expect the Vision to make reference to being connected to the National Park –	Comments noted. Second bullet point in paragraph 4.50 refers to the potential for the issues raised to be combined to deliver SDNP

<p>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.</p>	<p>and Biosphere related policy objectives.</p>
<p>Section: Development response: Education</p>	
<p>Support for school on site and/or concerned about lack of school facilities other than a sixth form entry.</p>	<p>Comment noted. The allocation for a secondary school at THV was based on a needs assessment that is explained in more detail in City Plan Part One Policy DA7 paragraph 3.91.</p>
<p>Provide indoor sports facilities community can use too, in particular young people</p>	<p>Comment noted. Paragraph 4.30 of the SPD refers to potential opportunities for the siting and design of a purpose built school to share use of sport/play facilities if possible. City Plan Part One Policy CP17 requires new development to contribute to the provision and improvement of sports services, facilities and spaces to meet the needs it generates in accordance with local standards.</p>
<p>Section: Development response: Office</p>	
<p>Support for modern office facilities</p> <p>Is office accommodation really needed?</p> <p>Local Plan policy on employment accommodation to meet business needs allows flexibility to respond to changing market and economic conditions, hence paragraph 4.43 not needed.</p>	<p>Comments noted. The need for office accommodation on this site results from identified assessed employment land needs for the city and as set out in the City Plan Part One and there is a requirement in Policy DA7 for modern offices to be delivered on this site.</p> <p>Paragraph 4.43 has been removed.</p>
<p>Section: Development response: Transport and travel</p>	
<p>Concerned with impact of development on quality of life,</p>	<p>Comments noted. The requirement for a Transport Assessment 'to identify the likely</p>

<p>road network, air pollution and/or road safety and/or flow. Getting transport assessment and/or road design, access points and mitigation costs right is vital to reducing impact.</p>	<p>effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use, implementing agreed travel plans and making appropriate contributions towards sustainable transport measures' is set out in City Plan Part One Policy CP9 Sustainable Transport.</p>
<p>Concerned about the cumulative impact of non-residential uses as traffic generators and/or parking demand and/or Court Farm development</p>	<p>Suggestions on ways to take account of and/or minimise the impact of noise and pollution and create a safe, comfortable and attractive network of public spaces in and around the development site are put forward in the Transport and travel and Public realm and blue-green infrastructure sections of the SPD.</p> <p>Noise levels are set in BS8233:2014 and World Health Organisation guidelines. The local planning authority would aim to secure these via planning conditions. It is important to note that that levels set are not absolute and design details can be used to mitigate to an acceptable level even where these guidelines are breached.</p>
<p>Concern with parking due to current and/or added pressure and potential for overspill into surrounding areas.</p>	<p>Comments noted. Paragraph 4.44 'Parking for vehicles and servicing areas' signposts the council's recently adopted parking standards guidance and recommends that individual developments provide sufficient delivery facilities and consider informal weekend Park + Ride use.</p>
<p>New development should explore ways to use underground car parking</p>	<p>Paragraph 4.6 identifies Transport Assessment (TA) as part of the information needed to inform assessment of a planning application.</p>
<p>Public transport improvements should be secured as early as possible.</p>	<p>Paragraph 4.6 identifies Transport Assessment (TA) as part of the information needed to inform assessment of a planning application.</p>
<p>Road design suggestions/preferences put forward to address road safety and traffic flow including room for buses and/or cycles.</p>	<p>Comments noted. The SPD does not prescribe or rule out any particular approach to road design such as those suggested by the respondent. Paragraphs 4.43 and 4.50 suggest a number of ways in which the design of the network of paths, roads and public transport across the site could help to deliver a range of policy objectives such as safely connecting the new development with neighbouring communities and promoting sustainable transport.</p>
<p>Any works that are proposed or required to be carried out by the planning applicant on the public highway to mitigate the impact of</p>	<p>Comment noted. Paragraph 4.40 added to flag up need for legal agreement to oversee implementation of mitigation measures in public highways.</p>

the development will require an appropriate legal agreement to be entered into with the relevant Highway Authority(ies).	
Support for improved, new links to SDNP, neighbouring areas and/or city centre in particular for pedestrians and cyclists.	Comment noted. Reference to improved links/connections to the SDNP for people as well as wildlife has been added to paragraph 4.44, third bullet point in the 'Links with the SDNP' section of the SPD.
Encourage potential new developers to take an integrated approach to links with the SDNP or bridge/tunnel and consider how they can best deliver multiple benefits (i.e. help mitigate the effects of air pollution)	
Development response: Public realm and blue-green infrastructure	
Support for securing SNCI restoration/long-term maintenance arrangements and/or protecting wildlife and/or delivering Biosphere objectives	Comments noted. Reference added to paragraph 4.52, 'SNCI and other large open spaces' section of the SPD to flag up opportunities for ecological surveys to help identify and define levels of public access that would not be detrimental to conservation objectives. Potential for plot boundaries that are permeable to wildlife and to reduce light pollution to reduce impact upon biodiversity is referred to in paragraph 4.50.
Support for introduction of trees, wildlife and/or biodiversity links across site and with SDNP and/or Three Cornered Copse and other green spaces around the site	
Important that the appropriate amount of park area, open spaces, children play and outdoor sports facilities are provided in the right places; which are safe and/or for all age groups as part of a network connecting communities in and around the development.	City Plan Part One policies CP16 and CP17 require that appropriate amounts of open space and sports provision be provided.
Concerned about contamination of the aquifer and/or flood/drainage issues	Comments noted. Reference added to paragraph 4.50 to illustrate ways in which sustainable urban drainage schemes can help reduce the risk of flooding as well as contamination of the aquifer.
Encourage the use of the sites topography to deliver extreme play opportunities.	Comment noted. Option added to second bullet point in paragraph 4.50 of the SPD.
Consider the utilisation and delivery of ecosystem services at Toad's Hole Valley and how Ecology and Tree surveys can	Comment noted. Change made to first bullet point of paragraph 4.6 and 4.52 to include reference to the ways in which these surveys can help assess impact upon and inform

provide benchmark data against which the delivery of ecosystem services and net gains in biodiversity can be monitored.	ecosystem service design and delivery.
Section: Development phasing and infrastructure delivery	
Specific design advice on heat network should be removed as it is dependent upon viability assessment.	Comments noted. Reference in paragraph 4.36 replaced with availability of local planning authority to provide design advice for planning applicants if needed/welcomed.
Other	
Disappointed with technical language used, not enough consultation, detailed design is not provided, and/or delivery of policy expectations.	Comments noted. The principle of development, requirements and priorities at the Toad's Hole Valley site is established and outlined in the recently adopted City Plan Part One Policy DA7.
Principle and/or parameters of development questioned and/or objected to	Part 1c of Policy DA7 states that 'the site will be the subject of detailed guidance provided in a future planning brief prepared in consultation with the landowners/developer and relevant stakeholders.' The THV SPD provides illustrations and examples which could aid the preparation of detailed development proposals and support the successful delivery of a new neighbourhood for the city and meets the legal parameters as to what a SPD can contain.
Broad support for SPD and/or segments of the SPD as guidance that identifies opportunities for development and potentially provides greater certainty for communities and developers	
SPD considered unlawful and not needed, City Plan Policies are sufficient.	
Query the comparisons made with other developments in the city (New England Quarter, Preston Barracks, Court Farm, Churchill Square, Jubilee Square)	In terms of residential density, the SPD does not identify the New England Quarter, Preston Barracks or Churchill Square as comparable developments, except perhaps for the fact that the first two are, along with THV, strategic sites of a scale rarely seen in the city. To illustrate how the density range for THV compares to that in other parts of Brighton & Hove examples of estimated densities for existing and recently developed sites have been added to page 18 of the SPD. Paragraph 3.5 of the SPD acknowledges a recent planning decision for the Court Farm site.
Panel exhibition attended and/or useful.	Comments noted. The one-day staffed exhibition in two venues located in the vicinity of the THV site was well attended and allowed detailed conversations on areas of concern/
Exhibition a waste of time or not enough as a means of	

communicating with stakeholders.	clarification.
Problem with the website when responding.	<p>This was not the only means of communicating details of the consultation which were provided to stakeholders. The consultation was communicated city-wide via the council's website and press release and lasted for an extended 11-week period (as opposed to the usual 6-week consultation period for SPDs).</p> <p>Stakeholder workshops were held at the issues and options stage of the SPD preparation to ensure input at an early stage of the SPD preparation.</p> <p>Reported problems with the council's consultation portal website were corrected during the consultation.</p>
Co-operation of the landowner with the council and potential developers will be of paramount importance.	<p>Comment Noted. The landowners/developers have been invited to participate and submit their views on the SPD at its various stages. Closer collaboration has been sought by the local planning authority and it is hoped the SPD will assist developers submit a successful planning application.</p>
Appendices set out further detailed design guidance for a 'Heat Network' on the site and to set out a 'high level design guidance' for an element of the scheme which may be unviable, is unnecessary and unreasonable.	<p>Comments noted. The Appendices were broadly used to support the non-technical nature of the Draft SPD consultation. Most items in the Appendices have been deleted with the exception of the Relevant Planning Policies and Glossary that have been incorporated into headings 6 and 7 in the final version of the SPD. The design guidance on heat networks has been removed as this can be made available through the planning application process.</p>

How these main issues have been addressed in the SPD

Many of the main issues raised have been positively incorporated into the final version of the SPD as indicated in the officer response above. Some of the issues raised during the consultation fell outside the remit of an SPD as they were challenging the adopted city plan policy for the site (amount or density of development) or would have significantly reduced the effectiveness of the SPD. Therefore not all the recommendations were incorporated into the document.

The majority of comments and/or suggestions made, in particularly those by statutory consultees that provided additional information and/or further clarification, were incorporated into the SPD.

A regular theme within the consultation responses was that the guidance does not go far enough in terms of reducing the impact of the development upon

transport/traffic and ensuring the number of car parking spaces in the new developments will be sufficient to avoid overspill on to neighbouring areas. A number of respondents put forward suggestions regarding road network, road safety and traffic flow however these detailed assessments are outside the scope of the SPD and would depend on the form of masterplan/development design put forward at the application stage.

To clarify, the purpose of the document is to set out supplementary guidance to assist applicants, members of the public and decision makers in the design and assessment of proposals. Impact assessments, including an assessment of transport issues in detail would follow on from design proposals submitted as part of pre-application discussions and/or a planning application.

The SPD seeks to strike the right balance between providing appropriate levels of advice to help applicants submit a planning application without being prescriptive so as fall outside the remit of a SPD or restrict innovation in the design of the development.

The intention is to speed up the planning application process by making applicants aware of the information they are likely to be asked to produce early on to inform the design process and consultation approach to support a planning application. This is intended to help planning applicants consider implications for project budget and timetable. The SPD identifies a locally trialled, tested and largely successful route that applicants could take when submitting a planning application.

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22 June 2017**