

21<sup>st</sup> March 2022 Planning Committee – Additional Representations (Toads Hole Valley)

Page	Comment
11	<p><u>Transport:</u> It should be noted that further transport information was also submitted after November 2021, in January 2022. This further Addendum was provided in response to ongoing discussions with the Council and National Highways, and to VISSIM modelling audit queries and also covered changes to the Goldstone Crescent/King George VI Avenue junction layout to improve provision for pedestrians and cyclists. This Addendum was included within the assessment made by the Local Highway Authority when they gave their comments (pages 66-69).</p>
12, 114- 116	<p><u>Ecology:</u> It should be noted that an updated Habitats Regulations Assessment: Shadow Screening Report was also submitted 2/11/21 as part of the additional ecological information. This examines whether there is potential for the proposed development to result in likely significant effects on European sites, namely those internationally protected at Castle Hill Special Area of Conservation (SAC), Lewes Down SAC, Ashdown Forest SAC/Special Protection Area (SPA)/Ramsar, Arun Valley SAC/SPA/Ramsar and Pevensey Levels SAC/Ramsar. It demonstrates the (updated) proposal is unlikely to give rise to significant adverse effects on any European sites, either alone or in-combination with other plans or projects, and this is concurred with. The proposals are considered to pass the Screening stage of the HRA in respect of all potential impact pathways, such that an Appropriate Assessment is not required.</p> <p>It is also clarified that the Environmental Statement addendum submitted 2/11/21 confirms that up to date data search and habitat surveys were undertaken by the applicant's ecological consultants in December 2020 and August 2021, which served to confirm that baseline conditions had not significantly changed since the species-specific surveys were undertaken in 2016-2018, such that the results of these surveys remained valid for the purposes of the impact assessment and associated mitigation strategies. The County Ecologist confirms this approach is reasonable and justifiable in this case. In addition, conditions can ensure comprehensive update surveys are conducted to inform detailed design and mitigation at the Reserved Matters application stage.</p>
18-21, 96- 102	<p><u>Additional Representation:</u> <b>Friends of the Earth</b> reiterate their previous concerns: Too much reliance on private car; cycling and infrastructure provision is inadequate and fails to meet the requirements of LTN 1/20.; failure to meet local and national policy and latest guidance; cycle lanes up King George VI Avenue, while welcome, are not providing</p>

	<p>for the main desire lines out of the development as the route accesses few services and amenities; proposed access to the National Park is poorly thought out; lack of high quality links proposed into Hove including station, schools and shops; Travel Plan is unambitious; masterplan should show cycle infrastructure within site; doesn't meet government's bold vision to decarbonise transport or help the city become carbon neutral by 2030.</p> <p><u>Officer comment:</u> These issues are covered in the report - the overall package of sustainable transport measures is deemed acceptable in principle (outstanding audits aside), and the exact layout and detail of such matters could be dealt with at Reserved Matters Stage and can also be controlled via condition/s106. The outstanding Road Safety Audit would assess the proposals against the most up to date standards. A site-wide cycling/pedestrian strategy is recommended to be secured by condition, as is a site-wide Design Code which can ensure such matters are prioritised from the outset. In addition, the masterplan can be conditioned meet BREEAM Communities 'excellent' standard which seeks to ensure the layout of the development is sustainable.</p>
18-21	The total number of objection/comment/support (including any duplicates following re-consultation) representations received should read as follows (following rechecking of figures): 425 'objection', 11 'comment' and 9 'support'.
77	Under 'Other' documents, the National Design Guide is also relevant.
83	<p><u>Paras 9.22-9.23 should be updated as the SHLAA Update 2021 (March 2022) has now been published.</u> It presents the updated five year housing land supply position as at 1 April 2021:</p> <p>"Policy CP1 in City Plan Part One sets a minimum housing provision target of 13,200 new homes for the city up to 2030. However, on 24 March 2021 the City Plan Part One reached five years since adoption. National planning policy states that where strategic policies are more than five years old, local housing need calculated using the Government's standard method should be used in place of the local plan housing requirement. The local housing need figure for Brighton &amp; Hove using the standard method is 2,311 homes per year. This includes a 35% uplift applied as one of the top 20 urban centres nationally.</p> <p>The council's most recent housing land supply position is published in the SHLAA Update 2021 which shows a five-year housing supply shortfall of 6,915 (equivalent to 2.1 years of housing supply).</p>

	As the council is currently unable to demonstrate a five year housing land supply, increased weight should be given to housing delivery when considering the planning balance in the determination of planning applications, in line with the presumption in favour of sustainable development set out in the NPPF (paragraph 11).”
135	<u>Additional Draft S106 Head of Term:</u> Provision of appropriate maintenance/management arrangements for ecological mitigation/enhancement and land uses within site including open space, play, sports, food growing, landscaping, public realm and community uses.

