

Planning Committee 25th May 2022 – Additional Representations (BH2022/00203 Toads Hole Valley)

Page	Comment
232-233, 337	<p>In response to the concerns expressed by <u>Southern Water</u> regarding potential for pollution of groundwater, and the developer's response (via RSK consultants), <u>the council's Flood Risk Manager</u> comments as follows. In addition, it should be noted that condition 63 requires submission of a Hydrogeological Risk Assessment at construction stage (see page 337), alongside other relevant conditions to control pollution, as set out.</p> <p><i>The response from RSK is reasonable.</i></p> <p><i>The risk of pollution from surface once the development is in use can be controlled through sustainable drainage methods and pollution prevention / management train. The Outline Application does not include exact designs for this (being an illustrative layout) but does list example solutions and confirms that the national standards for SuDS and the SuDS Manual Index Approach for pollution hazard will be followed and our sustainable drainage design condition will ensure this is designed out through spatial design stage at reserve matters to establish the site layout and subsequent detailed design for discharge of conditions through AoD Applications.</i></p> <p><i>Prevention of pollution of groundwater within SPZs is a Environment Agency requirement and I note there are conditions attached to the EA response.</i></p> <p><i>We can ensure there is a robust CEMP condition to include control of pollution from construction activities / during construction. If this condition requires a more detailed hydrological risk assessment to inform mitigation within a CEMP and pollution prevention to controlled waters we could be satisfied the risk is controllable within the parameter plans and quantum of development and therefore not a reason for refusal.</i></p>
229-230	<p>I (one) further revised representation from <u>Friends of the Earth</u> has been received reiterating previous concerns and also stating that too many significant issues remain unresolved and ignored by the Local Highway Authority. The NPPF test of severity for refusal of applications is too narrow. Need to dispense with 'predict and provide' model to 'vision and validate' methodology. Active travel is not prioritised and the travel plan is inadequate. There is an urgent need to reduce emissions.</p>

1 (one) further representation from Cycling UK Brighton and Hove reiterating their previous concerns of increased motor traffic and inadequate transport arrangements. Proposal will increase car dependence and fails to contribute to essential local and national targets regarding carbon reduction. Need to reduce traffic by at least 20%. Is essential people have safe alternatives to driving. Local Highway Authority response too generic and optimistic. Need to minimise the impact of transport-related air and noise pollution on local people. Travel Plan needs to be more ambitious and proper assessment of cycling network undertaken. Dumbbell roundabout are well-used but are increasingly hazardous, designs should aim to prioritise cyclists.

1 (one) further comment made by the Goldstone Valley Residents Association raising serious concerns regarding the robustness of the analysis relating to 4 named stand-alone junctions that will be operating outside of the theoretical capacity particularly at peak AM rush hour, and regarding the proposed mitigation.

1 (one) further representation has been received from a member of the public objecting on grounds of adverse impact to wildlife in Three Cornered Copse conservation area, additional traffic, overdevelopment and poor design. Congestion doesn't have to be 'severe' to be a problem.

Officer response: These above issues are covered in the report.