



Development Control
Brighton & Hove City Council
Hove Town Hall
Hove
BN3 3BQ

Sent by email to: planning.applications@brighton-hove.gov.uk

12 August, 2019

Dear Maria,

Objection to planning application: BH2018/03633 Toads Hole Valley – Land at King George VI Avenue, Hove

On behalf of Brighton & Hove Friends of the Earth (BHFOE) I would like to reiterate our objection to the above planning application particularly with regard to the site layout, the proposed transport arrangements, on and off site, and the lack of ambition in the travel plan. While there have been some minor improvements in that some of the previously shared paths have now been replaced by segregated facilities, little else appears to have changed, especially off site, which is very disappointing. We fail to see how this development can conform to the Local Plan which talks of an ‘exemplary’ development and to the National Planning Policy Framework which prioritises walking and cycling.

We also note that despite the developers stating in the Transport Assessment Addendum that they were addressing comments made by Friends of the Earth (in our previous objection), we found no evidence that they had addressed our substantive concerns.

No modal split target

We were concerned to read in the Transport Assessment Addendum that the developers have been asked (by the City Council and Highways England) to run further traffic modelling tests to show that the surrounding roads and junctions can accommodate more vehicles than they had originally tested for.

This development is going to determine the types of journeys and how they are made for years to come. It is important that if we are to meet our climate change targets and address other important societal problems such as air pollution, obesity, mental well-being, etc, we need to reduce car use and urgently. A new greenfield development like Toads Hole Valley, is a once in a lifetime opportunity to achieve something better as we are starting from an almost blank sheet of paper.

We believe that challenging but achievable modal split targets should be adopted in the Travel Plan to drive that change in the design of the development and the links to the outside world. We should not be looking at what current modal split patterns are in the surrounding area because this development, if done right, should be able to shape people's choices in a positive way and deliver something better than the status quo from day one. This is where we believe the council should be challenging the developer, not asking them to run more tests to show that the roads can cope with yet more cars.

We believe that the Travel Plan should be driving the design of the development. We would like to see much more ambition, with a 50 – 60% target for sustainable transport, not the rather weak target of approximately 40% sustainable transport at the start, increasing to roughly 45% by year 5. A new development like this is the perfect opportunity to reset people's travel habits, but only if it is properly planned with most of the infrastructure and services in place from the start.

In the Harlow and Gilston Garden Town draft Transport Strategy¹, the local authorities are aiming for 60% of all journeys within the new settlement to be by sustainable modes and 50% across the wider Harlow area. They are not being held back by planning for current modal shares, rather they want to actively shape future behaviour and this is what the development at Toads Hole Valley should be doing.

Poor site layout will encourage car use

The developers have completely failed to address our concerns around the layout and siting of the shops and doctor's surgery which will increase car use within the development. These should be close to the community centre and nearer the business park area to create a proper local centre within the site.

Far better access to these important facilities should be made for people walking and cycling, which are currently on the extreme edge of the development surrounded by a sea of car parking. It is rather ironic that the car parking overwhelms the amenity space in the area, yet the developers want to install less cycle parking because it might reduce the amount of amenity space here. It would be far simpler to reduce the car parking provision by a small amount to have a far bigger positive impact than undermining active travel.

¹ [Harlow and Gilston Garden Town Transport Strategy](#), Draft for consultation 2019

Status of the paths through the site is unclear

The updated Transport and Key Infrastructure Parameter Plan shows no segregated cycle route through the site east-west and shows all the paths through the central green spaces as shared. However, the Highways and Landscape Proposals: King George VI Avenue shows a segregated route through the site east-west but with all other paths in and around the central green spaces as reverting to footpaths. It is therefore difficult to sensibly comment on the changes when it is unclear as to what those changes are.

However, if all shared paths have been removed and not been replaced by segregated routes, then it is going to make access to the segregated east-west route harder, particularly by residents to the south of the route who would now have to access it via a footpath. Equally, if shared paths have been retained in the heart of the development this would cause conflict and undermine active travel.

Permeability of the site not addressed – it's too easy to drive everywhere

While there is some separation of the various blocks of housing, generally, most roads are open-ended and allow cars to cut through in multiple ways. This is excessive as is the number of driveways opening out onto King George VI Avenue. Although these have supposedly been reduced this is not shown on the Highways and Landscape Proposals: King George VI Avenue plan. At the very least, these access points for cars should be reduced or preferably removed as cars can access the site via the main access road. If these accesses are retained then any road connection with the rest of the site should be removed to help incentivise active travel.

Additionally, there seems to be little or no need to have roads crossing the eastern central green space, as currently portrayed. This will reduce the attractiveness and safety of this area. These two routes are labelled as secondary routes, yet for the amount of housing they are serving and the availability of alternatives, this seems excessive and unnecessary. Please see the attached diagram showing suggested roads that could be closed off.

Little or no advantage given to active travel – poorly thought out provision

Aside from the segregated routes and shared paths, depending on exactly what is proposed given the contradictory plans submitted, little advantage is given to people walking and cycling around the site. For example:

1. Residents in the northern part of the central northern block of housing are not served by any cycling infrastructure – their natural route would be along the main access road where there is no provision. Aside from being the most direct route, it will have a shallower gradient than the proposed cycle path further south and hence would be a better proposition.

2. The new segregated route through the site (if there is one) heads straight up the hill and would likely have a steep gradient which will make it harder to cycle up as well as being away from a lot of the housing. It would be interesting to know whether this meets the gradient requirements of IAN 195/16, but regardless of this the access road would likely provide a shallower and preferable route, with a link to the southern housing provided as a spur.
3. Residents in the central southern area close to King George VI Avenue, have no easy way of accessing the retail and doctor's surgery without literally going around the houses. They can't legitimately access the cycle path to the north (and to the community centre) and the one to the south doesn't actually deliver them safely to these local facilities. Walking facilities are a little better but not much. There also needs to be a pedestrian and cycle link across the thin finger of green space separating the south-west block to the south-central block of development. If this isn't provided it will be created anyway by residents taking the most direct routes. In fact, more than one crossing will probably be needed (see attached diagram).
4. There is no direct cycle access to the community centre, the shops or the doctor's surgery other than on road. There should be segregated facilities directly to these important locations which should also be sited adjacent to each other. The route outside the school is the wrong side of what could be a busy road and therefore won't be a useful link to the shops and doctor's surgery which are very unattractive and potentially unsafe places to cycle to because they are surrounded by a sea of car parking.
5. The segregated cycle facility past the school should be diverted closer to the school so that it doesn't have to cross the school access road and put school children cycling into conflict with motor vehicles (see attached diagram).
6. There needs to be a clear commitment that the segregated cycle routes are both continuous and have priority over side roads, otherwise their worth will be severely undermined. At present these don't look like they are continuous, especially along King George VI Avenue.
7. The segregated route to the business park area stops short of the business park. It should extend right to the last units, beyond the roundabout.
8. The main (western) access road junction at the bottom of the hill is still far too complex with a minimum 3 stage dog-leg crossing to get to Goldstone Crescent and other roads. If cyclists want to avoid this huge waste of time, they need proper, convenient, and attractive cycle facilities to deliver them safely onto the road exiting the site, not the short section of advisory cycle lane currently shown. While we would support the junction design with straight crossings (as requested by the city council) being better than the current dog-legged proposals, without substantial improvements to the cycle

facilities either side of the junction, this will make little difference to cycling levels, although it would improve the pedestrian and cycle experience.

9. The crossing near the eastern end of the main access road (opposite the bus gate) is also unnecessarily dog-legged. The design undermines the point of the segregating crossings, when it forces people walking and cycling to come into conflict on the central island.

Off-site active travel provision into town is poor

It is one thing to get transport provision within a site correct, but it is quite another to ensure it is well connected to the outside world (perhaps the most important requirement). We are very concerned that there appear to be no improvements to active travel links to local destinations such as:

1. Blatchington Mill School and Sixth Form College (Nevill Rd / Hangleton Rd)
2. Waitrose and other nearby facilities (Nevill Rd)
3. Hove Park Upper School (Nevill Rd)
4. The local centre in Hangleton (Hangleton Rd)
5. Shops in Old Shoreham Rd (Nevill Rd)
6. Hove Station (Goldstone Crescent/Hove Park/etc or Nevill Rd/Hove Park/etc)

In fact, the only provision previously proposed along Goldstone Crescent now seems to have gone backwards with dedicated facilities removed and all cyclists including children expected to use the road. Equally, no links along Nevill Road appear to have been examined despite this being a route to many important destinations which would benefit from enhanced cycle provision. If Goldstone Crescent is traffic calmed, then any speed bumps should not go across the full width of the road so that cyclists can go around them. Either that, or sinusoidal bumps should be used.

The route to Hove Station is important, but currently is not that easy or pleasant to follow and needs a substantial upgrade in signage and infrastructure to encourage people to access the train sustainably. This should be a key requirement for this development.

Devil's Dyke Road link too complicated, inconvenient and potentially unsafe

While the link across this major junction on the A27 is much needed, what has been proposed is something more akin to a challenge that Indiana Jones would take on. At a minimum it involves five separate crossings (and delays), a chicane and a gate and if you are travelling on the road, no way of continuing your journey without further obstacles. In short it fails to meet any of the criteria that would make it attractive for users, except that each individual crossing would be safer than having no crossing at all. However, the proposed access is so convoluted that it won't be well used and will fail to maximise access to the National Park and as such

would be a waste of resources. The chicane and guard railing could also add elements of danger to the design.

What is needed here is a green bridge. Failing that a crossing along the western side of the junction could reduce the number of crossings required down to two for on road cyclists and three for those wanting to access the off-road path (from the Toads Hole Valley development). This would be a much better utilised facility than that proposed as it would be more convenient, attractive and quicker. It would also require cycle access past Court Farm.

Access to Dyke Trail fragmented

Dyke Trail provides the only traffic free sealed surface (tarmac) route out into the Downs onto roads which are mostly pleasant to cycle on. Yet the access to the trail is undermined by the narrow path and its poor (rough, unsealed) surface from Downland Drive and around the back of the school. So while a route up the bank through the SNCI to Downland Drive is a welcome addition, without the path being improved through to the Dyke Trail, the new link isn't really a great improvement or much use.

In addition, there are issues with the width and surface of the Dyke Trail, particularly from the Golf Club up to Devil's Dyke Road where a short stretch is in very poor condition and could usefully be improved.

If all of these points were addressed a more accessible and inclusive path would be created out into the Downs.

National legislative changes since the revised plans were submitted

Since the updated plans were submitted, legislation came into force on 27 June 2019² committing the UK to zero net Carbon by 2050. As part of the action needed to reaching that goal, the Committee on Climate Change (CCC) has highlighted that its net-zero scenarios assume a 10% modal shift as electrification of the vehicle fleet won't help us reach the target on its own, as well as providing significant co-benefits (economic, environmental and health)³.

The CCC have highlighted as a priority that: *The Government must encourage walking, cycling and the use of public transport in preference to car usage wherever possible, including through provision of infrastructure for safe and practical cycling, to exploit opportunities for emissions reductions in the nearer term, as well as achieving health co-benefits from active travel and improved air quality.*⁴

² House of Commons Library, Research Briefing: [Legislating for net zero](#), 27 June, 2019

³ Page 240, Net-Zero – [The UK's contribution to stopping global warming](#), Committee on Climate Change, May 2019

⁴ Page 199, Net-Zero – [The UK's contribution to stopping global warming](#), Committee on Climate Change, May 2019

However, others believe that a 10% modal shift is too conservative and that a greater amount is required. Friends of the Earth have published research that suggests that at least a 20% reduction in road mileage will be needed to meet our carbon targets⁵.

Given the significance of the threat, the declared climate emergency both by Parliament and locally by Brighton & Hove City Council, there is an urgent need to address the impact of transport arising from new developments. This does not just mean mitigation in the traditional sense of promoting a few sustainable transport facilities to tick a box, but a far more intensive review of travel to increase the sustainable modal share from day one.

Changing the travel habits of established communities can be much harder compared to new communities where there is the opportunity to reset people's travel habits. Unfortunately, despite some new active travel infrastructure, the plans remain incoherent and the provision sub-standard. Indeed, what is most disappointing is that despite our previous objection about the lack of ambition in the travel plan, nothing as far as we are aware has changed. Given the new legislation and advice from the CCC, a revised travel plan with a far lower modal share for car use (including passengers) is now required.

The development is not 'exemplary'

Policy DA7 in the Brighton & Hove City Plan, stated that: *"The development will aim to be an exemplary standard in terms of environmental, social and economic sustainability"*

As the developers note, this is defined in the Oxford English Dictionary as "a desirable model; very good". Therefore, this development should be one that we would want to mimic elsewhere in the city and beyond to deliver more sustainable lifestyles. Given the urgent need to tackle climate change and lifestyles, transport and carbon are areas where urgent changes are required if we are going to stop the earth warming more than 1.5 degrees Celcius. Yet transport is one area, where this development fails badly. While it does have some sustainable transport elements, these are incoherent, unattractive and inconvenient and the links to the rest of the city and the South Downs are woefully inadequate to deliver any significant change in transport behaviour. Therefore, the development as it stands cannot be described as 'exemplary' as it is not one we would want to replicate elsewhere.

Changes required - summary

To achieve the carbon reduction required, to deliver an 'exemplary' development in conformity with the Local Plan and to deliver all the other co-benefits around air pollution, congestion, the economy and health, the points raised in our previous objection and mostly reiterated here need to be addressed. That means:

1. Setting an ambitious and challenging travel plan.

⁵ [A net zero carbon budget for the whole transport sector](#), Friends of the Earth, 27 June 2019

2. Prioritising walking and cycling over car traffic as per NPPF – replacing the incomplete, disrupted and complex active travel infrastructure with a seamless network with few interruptions as provided for car drivers.
3. Changing the development layout to bring the community uses closer together, nearer the heart of the development (and the community centre) and reduce the dominance of the car in the surrounding environment.
4. Reducing permeability for cars, while increasing it for active travel.
5. Ensuring that the proposed cycle facilities conform to IAN 195/16 or an equivalent standard.
6. Ensure that cycle routes are segregated, continuous and have priority over side roads.
7. Provide cycle facilities along the whole length of the main access road so that all parts of the development have access to high quality cycle provision.
8. Provide off-site cycle links to the local centre at Hangleton, to Waitrose and other destinations along Nevill Road and to Hove Station.
9. The path to the Dyke Trail should be widened and tarmacked and the Dyke Trail itself improved.
10. The path to the National Park along Dyke Road and crossing the A27 is a waste of money as currently proposed as it is so complicated and inconvenient. A green bridge or a route along the western side of the junction is preferable.

This should be read alongside our original objection for greater context. However, the headline has to be the recent passing of the legislation for new carbon reduction targets nationally requires that far more ambition is needed to reduce car use in and around this development site than has been shown to date.

I trust that this is clear but should you require any further information please do not hesitate to get in touch.

Yours sincerely,

Chris Todd

Planning & Transport Campaigner