

Appendix 4

**Hangleton & Knoll Neighbourhood Area and Forum applications
Officer responses to consultation comments received**

Question 3 - Please add any further comments you have about the proposed Neighbourhood Area

Consultee ref	Consultee type	Organisation name (if applicable)	Consultee comments	Council officer response
ID1	Individual		<p>The Eastern Area - currently undeveloped - should be included in the Hove Park Zone as it is within the Goldstone Valley and not H & K.</p>	<p>The area referred to (Toad's Hole Valley) is identified as a strategic development in the City Plan with detailed planning policy and guidance for its development already set out in Policy DA7 and the accompanying Supplementary Guidance Document 15 (SPD15). The Council itself is taking the lead in planning the future development in liaison with the promoters and landowners. Pre-application discussions between the Council and site promoters are now at an advanced stage and a planning application is expected to be submitted in the very near future.</p> <p>The Council's strategy and vision for Toad's Hole Valley as set out in Policy DA7 and SPD15 is for "a modern, high quality and sustainable mixed use development to help meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods" It is accepted that the proposed development site is currently somewhat separated from surrounding existing neighbourhoods (including both Hangleton and Goldstone Valley), however a key aim is to improve these linkages whilst also allowing for the development of Toad's Hole Valley as a distinctive new community.</p> <p>During preparation of City Plan Part 1 and the SPD, the Council undertook extensive</p>

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				consultation with all local residents and representative groups within both the Hangleton & Knoll and Hove Park wards and will continue to follow this approach. The designation of Hangleton & Knoll Community Action as a neighbourhood forum would not alter the Council's vision for the future development of Toad's Hole Valley as a distinctive new community with strong links to surrounding existing neighbourhoods.
ID2	Individual		-	
ID3	Individual		-	
ID4	Organisation	National Grid	An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.	Noted
ID5	Individual		I feel the Hangleton road is a dividing line between Hangleton and Knoll areas.	There are strong links between the Hangleton and Knoll areas and the Hangleton Road is not considered to form a significant barrier. It should be noted that the area's local shopping centre at 'The Grenadier', Hangleton Road lies on the boundary and serves both areas as well as part of West Blatchington which falls within the ward. The national planning guidance allows for neighbourhood areas to be defined on the basis of a range of relevant local factors

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				and there is nothing to prevent neighbourhood areas covering more than one identifiable 'neighbourhood' (for example many parish-based neighbourhood areas cover separate settlements). It should also be noted that the planning practice guidance states that electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area.
ID6	Individual		I am happy with the proposed boundaries.	Noted
ID7	Individual		<p>I do not believe the proposed neighbourhood of Hangleton and Knoll would be a coherent area for neighbourhood planning.</p> <p>In particular, whilst the land of Toad's Hole Valley falls within the ward of Hangleton and Knoll, there is no good reason why the valley should be included within remit of Hangleton and Knoll for neighbourhood planning.</p> <p>The triangular shaped area known as Toad's Hole Valley is not uniquely identified with the Hangleton and Knoll area.</p> <p>Whilst Toad's Hole Valley is bounded by Hangleton to the West, it is separated from Hangleton by a very steep bank, which creates a high degree of severance. On account of this physical severance, it is most unlikely that there will be a strong interdependence between Toad's Hole Valley and Hangleton.</p> <p>The valley is more closely associated with the Goldstone Valley area from which it is currently separated by the fast moving traffic on King</p>	<p>Toad's Hole Valley is identified as a strategic development in the City Plan with detailed planning policy and guidance for its development already set out in Policy DA7 and the accompanying Supplementary Guidance Document 15 (SPD15). The Council itself is taking the lead in planning the future development in liaison with the promoters and landowners. Pre-application discussions between the Council and site promoters are now at an advanced stage and a planning application is expected to be submitted in the very near future.</p> <p>The Council's strategy and vision for Toad's Hole Valley as set out in Policy DA7 and SPD15 is for "a modern, high quality and sustainable mixed use development to help meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods" It is accepted that the proposed development site is currently</p>

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			<p>George VI Avenue, but it is intended that the intrusiveness of that traffic will be reduced. The residents of Goldstone Valley have shown much more interest in the future of the Toad's Hole valley and will no doubt become even more engaged when a planning application is submitted for the valley. Toad's Hole Valley is also closely related to the West Blatchington area, not least because the new development will create a serious traffic impact upon it.</p> <p>The future development of Toads Hole Valley is too important for it to be treated as an adjunct to an established area, under the aegis of an existing forum created for a quite different purpose. It is anticipated that the valley will have a unique character that is different from the surrounding suburbs, so it should be recognised as a distinct neighbourhood with its own forum established with the specific purpose of nurturing its distinctiveness.</p>	<p>somewhat separated from surrounding existing neighbourhoods (including both Hangleton and Goldstone Valley), however a key aim is to improve these linkages whilst also allowing for the development of Toad's Hole Valley as a distinctive new community.</p> <p>During preparation of City Plan Part 1 and the SPD, the Council undertook extensive consultation with all local residents and representative groups within both the Hangleton & Knoll and Hove Park wards and will continue to follow this approach. The designation of Hangleton & Knoll Community Action as a neighbourhood forum would not alter the Council's vision for the future development of Toad's Hole Valley as a distinctive new community with strong links to surrounding existing neighbourhoods.</p>
ID8	Organisation	Historic England	<p>Thank you for consulting Historic England on the Proposed designation of the Hangleton and Knoll Neighbourhood Plan Area. I am pleased to confirm that, within the areas of interest to Historic England, we see no reason to object to the designation of this area. As such we would be grateful if the council could pass the following comments on to the Neighbourhood Forum.</p> <p>With regard to the historic environment we note that the area contains 8 listed buildings,</p>	Noted

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			<p>which include an unusually high proportion of the higher grade II* buildings, as well as the Hannington and Benfield Barn Conservation Areas. Whilst the government advise that all decisions affecting heritage assets should be informed by understanding of their significance and should seek to avoid or minimise conflict between their conservation and any aspect of a proposal, the NPPF states that the loss of such a designated heritage asset should be wholly exceptional and that great weight should be given to their conservation in decision making. Nevertheless, it also states that there may be opportunities to enhance or better reveal the significance of heritage assets and for new development to benefit from their positive integration. Local planning authorities are instructed to include policies in their plans to conserve those heritage assets most at risk of decay, neglect and other threats, and this should also provide a helpful direction for neighbourhood plan fora.</p> <p>Benfield Barn Conservation Area, one of the country's smallest conservation areas, has been recorded on our 'At Risk' register for several years. We would welcome the Neighbourhood Plan giving consideration to the issues affecting the area, specifically providing a use for the barn that conserves its historic and architectural interest, ideally whilst providing opportunity for the community to appreciate this.</p>	

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			<p>The area may also contain non-designated heritage assets that either have not been designated previously or are considered to be of local interest and therefore meriting consideration in planning, even where they do not meet national criteria for designation. The East Sussex Historic Environment Record is one repository of information on the potential location of such heritage assets and is an important source of evidence for planning decisions that should be consulted where plan policies have potential impacts on land. The neighbourhood plan forum will need to demonstrate they have taken the need to conserve such non-designated assets into consideration in developing the plan.</p> <p>The plan is also an opportunity to harness the enthusiasm of the community to identify those features of the area they consider to represent their heritage by preparing their own list of local heritage assets and preparing policies that support their consideration and appreciation. Our advice on heritage assets and local heritage lists may be of assistance and can be viewed on line at: https://historicengland.org.uk/listing/what-is-designation/local/local-designations/.</p> <p>We hope these comments are of assistance to the Council and the Neighbourhood Plan Forum but would be pleased to answer any queries relating to them.</p>	

Question 6 - Please add any further comments you have about the proposed Neighbourhood Forum

Consultee ref	Consultee type	Organisation name (if applicable)	Consultee comments	Council officer response
ID1	Individual		H & K would become too great an area and be able to impact on a neighbouring area without taking into account those living adjacent to the proposed new development.	As noted in the response to comments on Q3, Toad's Hole Valley is identified as a strategic development in the City Plan and planning for its development is being led by the Council itself with detailed planning policy and guidance already set out in Policy DA7 and the accompanying SPD15. Pre-application discussions between the Council and site promoters are now at an advanced stage and a planning application is expected to be submitted in the very near future. During preparation of the SPD, the Council undertook extensive consultation with all local residents and representative groups within both the Hangleton & Knoll and Hove Park wards. The designation of Hangleton & Knoll Community Action as a neighbourhood forum would not affect the Council's approach and the Council will continue to consult residents and representatives of all neighbouring areas about the future development of Toad's Hole Valley.
ID2	Individual		I welcome this forum as it will give the residents information on what is being proposed for the area ie housing etc.	Noted
ID3	Individual		-	
ID4	Organisation	National Grid	-	
ID5	Individual		-	
ID6	Individual		I feel the forum should contain proportional representation of those who live and work in	The neighbourhood planning regulations do not require proportional representation, but do

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			the Community.	require that the Council is satisfied that the forum has taken reasonable steps to ensure that the forum membership includes representation from residents, people who work in the area and elected members, and that the forum membership drawn is from different places in the area and different sections of the community in the area. The forum application indicates that the Hangleton & Knoll Community Action membership currently comprises 37 individuals, including 26 who live in the proposed neighbourhood area, 26 who work or volunteer within the area, and the 3 Brighton & Hove ward councillors. The forum application also included a map showing the distribution of Community Action members' homes and workplaces within the ward (was the map made public?). Based on this, officers are satisfied that the forum membership would include representation from the required categories from within the local community and would be drawn from across the neighbourhood area. It should also be noted that the designated Forum's membership would be open to other individuals living and working in the area to join and is likely to change over time.
ID7	Individual		I do not believe the Hangleton and Knoll Forum is an appropriate organisation for the neighbourhood planning of either Toads Hole Valley or West Blatchington. Whilst the Hangleton and Knoll Community	West Blatchington is geographically split between the Hangleton & Knoll and Hove Park wards which may partly explain why Hangleton & Knoll Community Action may not have been able to engage as effectively with local

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			<p>Action Project is very well established within the areas of Hangleton and Knoll, it is of little relevance beyond. It has shown no empathy with the West Blatchington area, where I live; it does not represent its residents and groups, occasionally it has circulated the odd leaflet, but that has been the extent of any engagement within West Blatchington.</p> <p>More importantly the Hangleton and Knoll Forum is not the appropriate body to plan for the future of the distinctive new development area of Toads Hole Valley.</p> <p>To date the Hangleton and Knoll Project has shown only limited interest in the future of Toads Hole Valley and did not participate in the Examination in Public of the City Plan when the issues affecting the valley were being explored. Instead of future of Toad's Hole Valley being annexed by an existing project group established for a very different purpose, a new forum should be created to deal with neighbourhood planning for Toad's Hole Valley. That forum should have representatives drawn from all the residential areas surrounding the valley and, in due course, new residents and groups within the valley itself.</p> <p>The development of Toad's Hole Valley is too important for it to be treated as an adjunct to an established area under the aegis of an existing forum created for a quite different purpose. It is anticipated that the valley will have a unique character that is quite different</p>	<p>residents and groups from the area. However, the boundary of the Hove Park Neighbourhood Forum is already established along the ward boundary, so it makes sense for the remaining (western) part of West Blatchington to be included within the Hangleton & Knoll neighbourhood area. Once established, the Neighbourhood Forum would be open to further West Blatchington residents to join and influence future neighbourhood planning in the area.</p> <p>As noted in the response to comments on Q3, Toad's Hole Valley is identified as a strategic development in the City Plan and planning for its development is being led by the Council itself with detailed planning policy and guidance already set out in Policy DA7 and the accompanying SPD15. Pre-application discussions between the Council and site promoters are now at an advanced stage and a planning application is expected to be submitted in the very near future. During preparation of the SPD, the Council undertook extensive consultation with all local residents and representative groups within both the Hangleton & Knoll and Hove Park wards. The designation of Hangleton & Knoll Community Action as a neighbourhood forum would not affect the Council's approach and the Council will continue to consult residents and representatives of all neighbouring areas about the future development of Toad's Hole Valley.</p>

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			from the surrounding suburbs, so it should have a neighbourhood forum that is established with the specific purpose of nurturing its distinctiveness.	
ID8	Organisation	Historic England	-	