

# **CULTURE, HERITAGE, SPORT, TOURISM & ECONOMIC DEVELOPMENT COMMITTEE ADDENDUM 1**

**4.00PM, THURSDAY, 9 NOVEMBER 2023**

**COUNCIL CHAMBER, HOVE TOWN HALL, NORTON ROAD,  
HOVE, BN3 3BQ - HTH/CC**

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# ADDENDUM

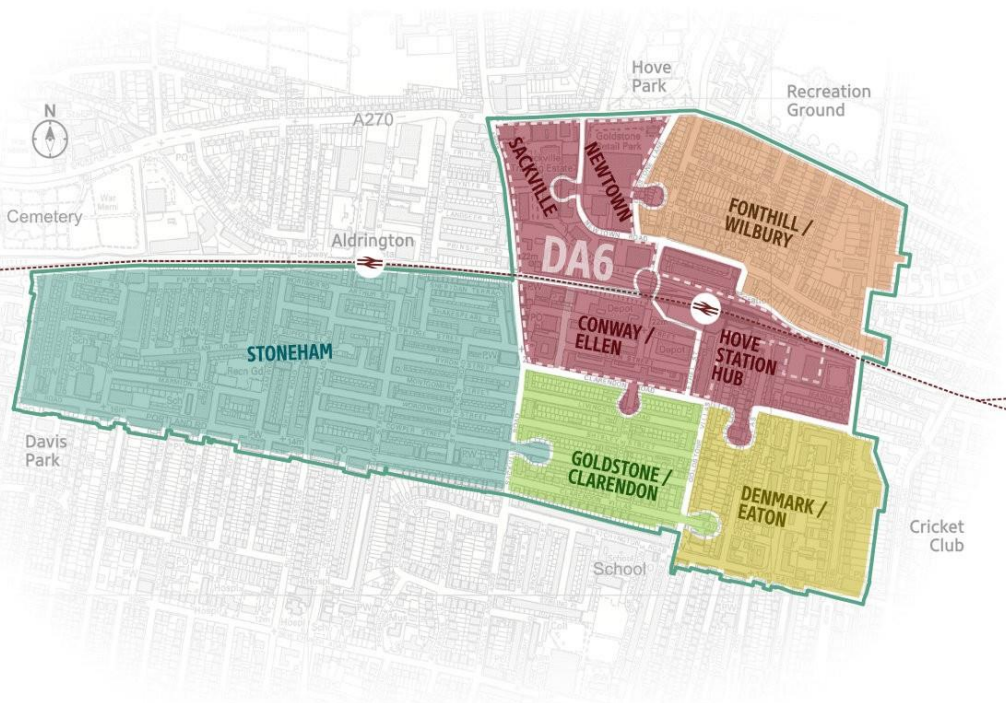
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# HOVE STATION NEIGHBOURHOOD PLAN

2019-2030

*The whole is greater than the sum of its parts*



## PART ONE: POLICIES

~~REGULATION 16 REFERENDUM VERSION, DECEMBER 2020~~  
DECEMBER 2023

Hove Station  
Neighbourhood  
**FORUM**

[HoveStationForum.co.uk](http://HoveStationForum.co.uk)

## About This Document

Hove Station Neighbourhood Forum are the 'statutory qualifying body' for the purpose of producing this neighbourhood plan.

The cover image indicates the boundary of the designated plan area in relation to Development Area 6. It also illustrates the Forum's aim, which is to create a new Hove Station Quarter (shown in red).

Contact details, supporting information and digital copies are available at:

[www.hovestationforum.co.uk](http://www.hovestationforum.co.uk)

## Acknowledgments

The Forum wishes to thank all resident members for their valued input online and via our workshops and have your say day events. We would also like to thank the following organisations for their input and support.



Table 1 - Organisations who have provided support in the creation of the Plan





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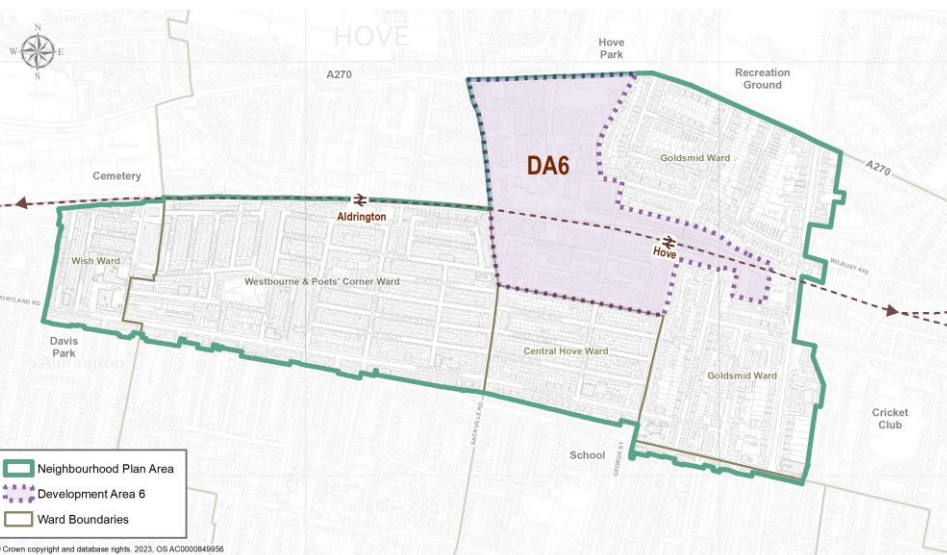
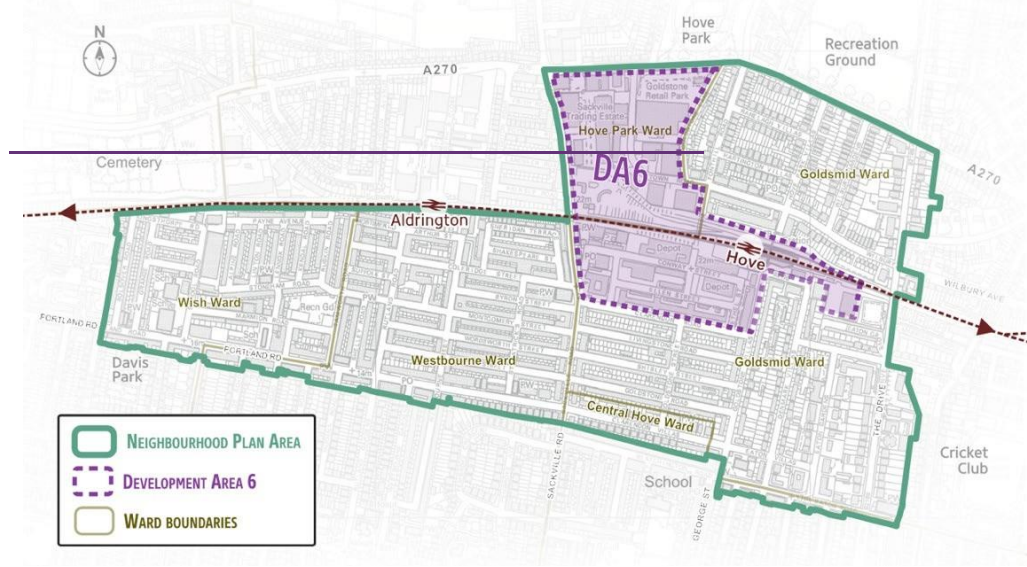
SECTION 1

## Introduction

- 1 The Localism Act 2011 provided powers for local communities to prepare statutory Neighbourhood Plans which, along with city and district-wide Local Plans, have to be taken fully into account by planning officers and councillors when they make decisions on planning applications. Under this legislation the Hove Station Neighbourhood Forum (HSNF), having met all statutory requirements, was designated by Brighton & Hove City Council (BHCC) on Sept 18th 2014 as a 'qualifying body' with the legal right and responsibility to prepare the Hove Station Neighbourhood Plan (HSNP) for the designated Neighbourhood Plan Area shown at [Figure 1 below](#). Such designation ceases to have effect after 5 years (Town and Country Planning Act 1990 Section 61F (8)(a)). An application for redesignation was approved by the City Council on 18th September 2019.
- 2 The initiative to prepare the [Hove Station Neighbourhood Plan \(HSNP\)](#) came from local residents and businesses in late 2012 when it became clear that the area around Hove Station was going to be designated City Plan Development Area 6 (DA6) and thus the focus of major regeneration projects over a period of some 10-15 years - [see Figure 2](#). It is one of the eight such development areas in the City Plan which will undergo major changes during the plan period, and which contain the city's major development opportunities up to 2030. The large-scale regeneration of DA6 will transform the long-neglected area within its boundaries. But it will also have major impacts on adjacent 19<sup>th</sup> century residential areas, including the area popularly known as Poets Corner, where the City Plan anticipates relatively small-scale redevelopment projects.

Figure 1 - Designated Neighbourhood Plan Area

Commented [RD1]: Map replaced with updated wards version



## 1.1 Legal requirements for a Neighbourhood Plan

- 1 The HSNP covers the same period as the BHCC City Plan, namely up to 2030. It develops and elaborates further the strategic framework established by the City Plan for the future development of the Designated Area and will sit alongside the City Plan as the statutory plan for the area. The Neighbourhood Plan is seen by the Forum as providing the policy context for the Hove Station Area Master Plan for the area.
- 2 All Neighbourhood Plans have to meet certain **basic conditions**, as specified in law. Thus, the HSNP must be in general conformity with the city wide strategic policies of the *City Plan Part 1*, including those for housing (at both market rate and affordable levels), the provision of space to provide jobs, community facilities and green infrastructure, the conservation of the historic environment and sustainable transport. Hence, the detailed and neighbourhood specific policies of the NP do not repeat City Plan policies but refer to them as appropriate.
- 3
- 4 The NP also has to have regards to national policy and advice as set out in the *National Planning Policy Framework* and the related *Neighbourhood Planning Guidance*.<sup>1</sup> In particular an NP cannot propose less growth in the Designated Area than that specified in the City Plan, but it can propose an increased level if it meets the other basic conditions set out for neighbourhood plans (see below). An important role of the NP is to identify community priorities for the investment in the Neighbourhood Area of a proportion of developer contributions generated by

<sup>1</sup> [neighbourhoodplanning.org/wp-content/uploads/NP-Roadmap-online-full.pdf](https://neighbourhoodplanning.org/wp-content/uploads/NP-Roadmap-online-full.pdf)

**Commented [RD2]:** The legal requirements are already covered in the Basic Conditions Statement supporting the Neighbourhood Plan.

development. The NP will have to be assessed by BHCC that it meets all the basic conditions i.e. that it is in general conformity with the City Plan and national planning policies and government guidance, that it contributes to the achievement of sustainable development, and that it meets certain EU wide requirements.<sup>2</sup>The Council's decision about whether the NP meets all the basic conditions and should proceed to referendum will be informed by an independent examination by a suitably qualified examiner.

<sup>5</sup> Within this legal framework, neighbourhood planning is fundamentally a participatory planning process. Thus, as required by law, the process of preparing the HSNP has been informed and guided by the direct participation of the local community – individual residents and businesses, local voluntary groups and ward councillors – at all stages in its preparation.<sup>3</sup>

<sup>6</sup> The NP has to include a **Consultation Statement** which demonstrates that the Forum has taken all practical measures to ensure that the local community has been fully and effectively involved in its preparation. Furthermore, unlike any other official development plan, it has to be supported by local residents through a local **referendum** in which the question will be:

***'Do you want Brighton & Hove City Council to use the Hove Station Neighbourhood Plan to help it decide planning applications in the Neighbourhood Area?'***

<sup>2</sup>set out in the above neighbourhood guidance.

<sup>3</sup>see table: Neighbourhood Planning Process

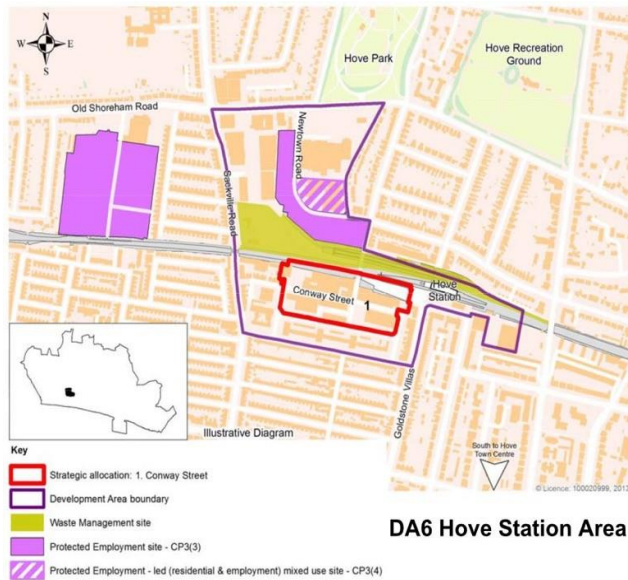


Table 2

Neighbourhood Plan Process		
Stage 1	Getting established	More info
September 2014	Designation of the neighbourhood area	<a href="https://hovestationforum.co.uk/hove-station-neighbourhood-plan-boundary-questions/">hovestationforum.co.uk/hove-station-neighbourhood-plan-boundary-questions/</a>
December-2014	Designation of Forum with legal authority to prepare a Neighbourhood Plan	<a href="https://hovestationforum.co.uk/hsnf-designated-as-a-body-qualified-to-prepare-a-neighbourhood-plan/">hovestationforum.co.uk/hsnf-designated-as-a-body-qualified-to-prepare-a-neighbourhood-plan/</a>
November-2015	Vision Consultation	<a href="https://hovestationforum.co.uk/vision">hovestationforum.co.uk/vision</a>
2014-2018	Gathering evidence	<a href="https://hovestationforum.co.uk/tag/evidence/">hovestationforum.co.uk/tag/evidence/</a>
2014-2018	Publicity and engagement	<a href="https://hovestationforum.co.uk/category/communicationandcommunity/">hovestationforum.co.uk/category/communicationandcommunity/</a>
Stage 2 Preparing the plan (Forum)		
April-2016	Drafting the plan	<a href="https://hovestationforum.co.uk/plan">hovestationforum.co.uk/plan</a>
November-2018	Meeting the basic conditions	<a href="https://hovestationforum.co.uk/faqs/how-is-the-plan-being-prepared/">hovestationforum.co.uk/faqs/how-is-the-plan-being-prepared/</a>
March-2019	Pre-submission consultation (Reg. 14)	<a href="https://hovestationforum.co.uk/draft-plan-ready-for-public-consultation-reg-14/">hovestationforum.co.uk/draft-plan-ready-for-public-consultation-reg-14/</a>
Stage 3 Bringing the plan into force (LPA)		
Summer-2020/Spring 2021	Submission to Local Planning Authority	<a href="https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan">https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan</a>
Winter-2020/May - July 2021	Regulation 16 Consultation	<a href="https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan">https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan</a>
Spring-2021/January 2022 - October 2023	Independent examination	<a href="https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan">https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan</a>
December 2023	Council decision	<a href="https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan">https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan</a>
Summer-2023/Early 2024	Referendum	<a href="https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan">https://www.brighton-hove.gov.uk/hove-station-neighbourhood-plan</a>

## 4.21.1 The need and opportunity for a Hove Station Neighbourhood Plan

Figure 2 - Development Area 6 - City Plan



71 The issues which the local community wish to see addressed by the Neighbourhood Plan emerged from our five years of community engagement work which is presented in the **Community Consultation Statement**. This activity initially focussed on two questions:

- why should the local community organise to prepare a Neighbourhood Plan?
- which area should the Neighbourhood Plan cover?

82 The need and opportunity for a Neighbourhood Plan emerged in **Autumn 2012** from three parallel processes:

- the designation of DA6 in the BHCC Proposed submission City Plan Part One which made the eventual radical transformation of the DA6 area and the surrounding neighbourhoods inevitable, but had passed by the local community almost completely unnoticed;
- the pre-application consultation events organised by local landowner Matsim on the Hove Square Project for the large-scale comprehensive redevelopment of the whole of DA6 south of the railway – which prompted significant local opposition;



- iii growing local awareness of the new powers, under the Localism Act 2011, for local communities to prepare Neighbourhood Plans, which would enable them to more effectively influence the future development of their neighbourhood.

<sup>93</sup> In order to realise the opportunity of preparing a Neighbourhood Plan, the first priority was to secure the designation of a statutory Neighbourhood Forum and Neighbourhood Area by BHCC. In the event, and after an encouraging start, this took the whole of 2013 and 2014

<sup>104</sup> During this period a number of Have Your Say Days were organised all aimed to inform the local community about the current planning situation and starting to explore opportunities for improvements in the area.

<sup>115</sup> In December 2014 Hove Station Neighbourhood Forum was designated as the 'qualifying body' to prepare the Hove Station Neighbourhood Plan. Following an inaugural AGM in February 2015, the Forum established working groups to identify issues, develop its emerging vision and objectives for the Neighbourhood Plan, building on its initial analysis of issues and opportunities and continuing community engagement work. This process is fully documented in the Consultation Statement which sets out details of community involvement in the plan preparation.

## 1.31.2 Overview of the Neighbourhood Plan

<sup>126</sup> [Section 2](#) provides an **Area Profile** which describes its physical, social, economic and environmental characteristics. These derive from the original 19<sup>th</sup> century development and the late 20<sup>th</sup> century redevelopment of much of the railway land and adjacent small, poor quality terraced housing. More recently the changing housing market and the activities of developers have prompted the onset of 21<sup>st</sup> century regeneration. This analysis identifies the **issues** which the local community believes should be addressed by the Neighbourhood Plan (NP), together with the opportunities for the development of neighbourhood level policies and projects which will enable local residents and businesses to influence and share in the benefits of regeneration. The analysis also profiles a series of distinct sub-areas, with specific characteristics, planning and landownership issues and development potential. This analysis, informed and guided by ongoing community engagement work, is the basis of the development of the vision and strategic objectives of the NP and the planning policies developed to deliver the plan.

<sup>127</sup> [Section 3](#) sets out the **Vision and Strategic Objectives** of the NP. From the outset it has been the ambition of the local community to see the regeneration of the designated area progress in a comprehensive way so that the whole is greater than the sum of the parts. This approach requires detailed planning for the implementation of City Plan Policy DA6 to develop its strategic land-use proposals for the segregation of different major types of land uses, into a spatial development framework of policies which promote and support the delivery of an integrated process of regeneration, rather than the piecemeal, site by site redevelopment which has characterised recent years. Thus, the NP **Vision** is focussed on the creation of **Hove Station Quarter (HSQ)** as a new centre for Hove. This will be core of the Neighbourhood Area in which a substantial number of residential units, along with a more modern mix of employment opportunities, can be accommodated. The NP enhances the role of Hove Station as a sustainable transport hub by the provision in DA6 of a rich and diverse mixture of high-quality market and affordable housing, along with office, cultural and high-tech employment opportunities and a wide range of services and facilities for people living and working in the area. Throughout the wider Neighbourhood Area proposals for public realm improvements, traffic calming and management of pedestrian and cycle-based flows, spaces for children to play and outdoor space for young people, all aim to create an attractive environment in which to live, work and play.

<sup>128</sup> [Section 4](#) presents the *Neighbourhood Plan Policies* in a format that demonstrates how each policy responds to issues raised by the community and contributes to the delivery of the Vision and Strategic Objectives. But a statutory Neighbourhood Plan can only establish policies for changes in the use and development of land and buildings which require planning permission. However, the government has recognised that in the process of preparing neighbourhood plans local communities will come up with ideas and opportunities for specific projects which do not require planning consent, but which will help to deliver sustainable development, such as energy efficiency and domestic renewable energy generation. Thus, this Neighbourhood Plan document has two parts:



159 **Neighbourhood Plan PART ONE** contains the statutory Neighbourhood Plan policies to be used in determining planning application in the area, all aimed at maximising the extent to which the NP can contribute to the delivery of a Hove Station Quarter and improvements across the wider Neighbourhood Plan. The Neighbourhood Plan area is wholly contained within that part of the area of Brighton & Hove covered by the City Plan and is not required to take account of plans covering neighbouring areas such as South Downs Local Plan. ~~These policies will be reviewed by an Independent Examiner and be subject to Referendum.~~ All these policies have to be deliverable within the life of the NP and cover:

- Co-ordinated and integrated redevelopment of DA6
- Housing
- Employment
- Design and public realm
- Community facilities and Community Hubs
- Conservation
- Transport and movement
- Implementation

~~1610~~ The NP Part One presents both neighbourhood level policies which are specific to DA6 (and thus central to the delivery of a new Hove Station Quarter) and others which are to be applied throughout the whole Neighbourhood Plan Area.

~~1711~~ **Neighbourhood Plan PART ONE ANNEX: Priorities for Implementation** sets out potential infrastructure improvements to the Hove Station Quarter which could be funded from the Community Infrastructure Levy (CIL) and other funding sources. includes three documents and links to more detailed documents on the Forum web site: [www.hovestationforum.co.uk](http://www.hovestationforum.co.uk)

- ~~Funding measures for proposed infrastructure,~~
- ~~The statement of compliance with the National Planning Policy Framework (NPPF) and the City Plan Part One~~
- ~~A summary of the Strategic Environmental Appraisal (SEA)~~

~~1812~~ **Neighbourhood Plan PART TWO** is an advocacy/bidding document which the Forum and other neighbourhood groups will be able to use, alongside the statutory NP, to attract both public and private investment in the area which will deliver public benefit and help realise the vision of a sustainable Hove Station Quarter. ~~These proposals will not be reviewed by an Independent Examiner and will not be subject to a referendum. The Part Two document does not form part of the statutory Neighbourhood Plan and has not been subject to Examination.~~ PART TWO contains:

- **The Urban Quarter Concept Master Plan** for DA6 prepared by the Forum which ~~informs the future planning~~ has informed the work Hove Station Masterplan prepared by BHCC (the City Council in partnership with the Forum and landowners) of a Hove Station Master Plan / SPD which has been adopted by the Council as the Hove Station Area Supplementary Planning Document (SPD18)
- **Aspirational land-use proposals** for development which cannot be demonstrated to be deliverable in the next 15 years. These include:
  - long term development proposals which may, in the event be brought forward by landowners as market conditions change e.g. the redevelopment of the Goldstone Retail Park
  - proposals for the development of genuinely affordable housing as part of the overall housing delivery in DA6
- **Community Projects** - outline development schemes which set out how NP policies could be delivered would help to deliver the neighbourhood policies and elaborate priorities for the neighbourhood investment of developer contributions e.g. initial proposals for the Community Hubs centred on Hove Station and the Sackville Road Honeycroft Centre and for environmental improvement in the Portland Road shopping and commercial area.
- **Non-land use policies and projects** which promote neighbourhood improvement but do not need planning approval, e.g. an outline Neighbourhood Community Energy Project to promote domestic energy efficiency and renewable energy generation.

SECTION 2

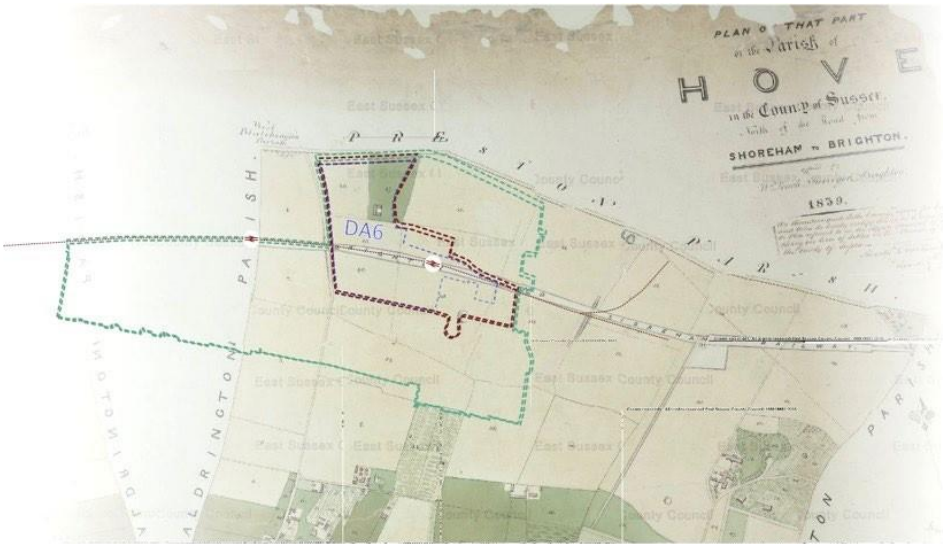
## Area Profile

### Character, Context and Neighbourhood Planning Issues

1913 This section first presents a description of the characteristics of the Neighbourhood Area in its city context, in terms of key area-wide themes: the built environment (land and buildings), social conditions (population and housing), local economic activity, community infrastructure/environment and transport and movement. For each theme the issues which the local residents, community organisations and businesses believe should be addressed have been identified through our community engagement processes.

2014 This is followed by an analysis of the significant variations within the designated NP area. These place specific issues for the Neighbourhood Plan are identified as a jigsaw of neighbourhood sub-areas, with a wide range of challenges and opportunities for future neighbourhood development.

Figure 3 - 2 Hove Tithe Map 1839 with DA6 and neighbourhood plan area superimposed





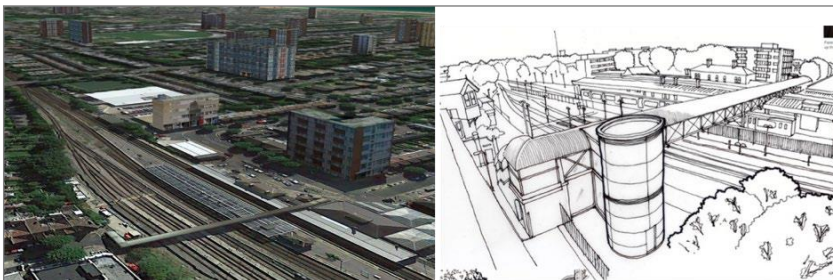
## 2.1 Land and buildings: thumbnail sketch of a pre-1914 inner city suburb

2.15 The whole of the Neighbourhood Plan Area designated by BHCC can be characterized as an urban pre-1914 primarily residential inner suburb, which surrounds the major transport hub of Hove Station with its adjacent industrial and commercial development.



2.16 The area was defined by BHCC as the outcome of a process which was dominated by the priority given to ward boundaries. Thus, it is bounded on the east by The Drive, on the north by the Old Shoreham Road as far west as Sackville Road, which it follows south to the railway bridge and then west along the railway line to the western boundary at Bolsover Road. The southern boundary follows Portland Road – Clarendon Road- Eaton Road to The Drive. The area is divided by the railway line running east-west and Sackville Road running north-south.

2.17 Generally, the area slopes gently downhill from north to south. Thus, there are significant changes in the level of the built environment from east to west and from north to south. This topography provides both challenges and opportunities for regeneration.



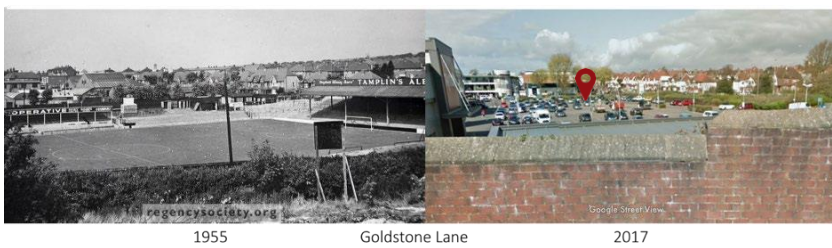
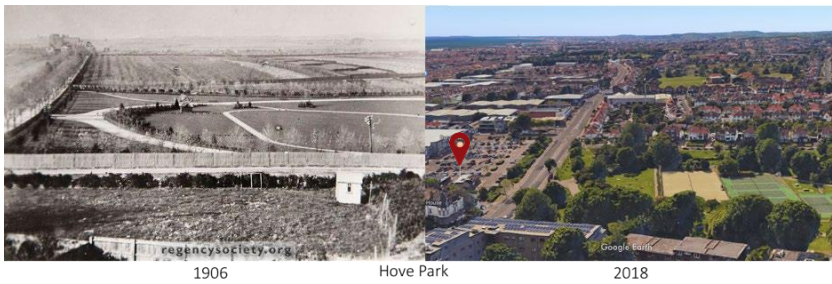
2418 The Neighbourhood Plan Area as a whole is typical of mid-late 19th century urban development close to a major station. It was partially redeveloped in the post-war period and now comprises several distinct types of residential areas adjacent to rundown areas of underused land and buildings (both north and south of the railway), which constitute a major brownfield site with significant development potential.



2519 The residential areas are all laid out in a clearly defined grid pattern, but with a variety of house types and streetscapes ranging from modest terraced houses and maisonettes (with some of the highest gross densities in the city) to magnificent detached and semi-detached Victorian villas, some of which have been redeveloped /converted into apartments or residential homes and many are in designated Conservation Areas. East of Sackville Road there is no significant neighbourhood green open space. This was acknowledged by the then Hove Council which led to the creation of Hove Park north of Old Shoreham Road from 1906 onwards.

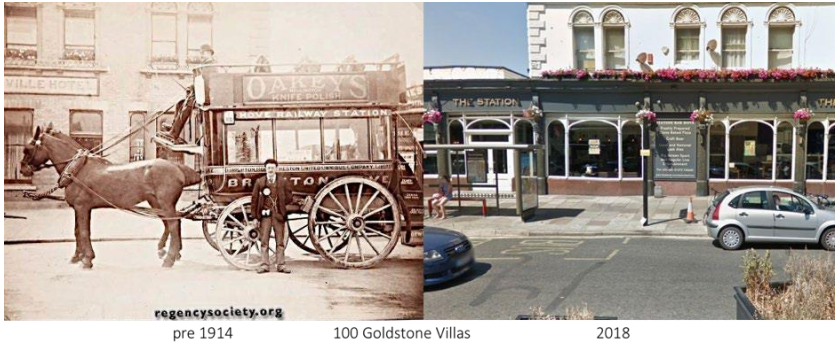
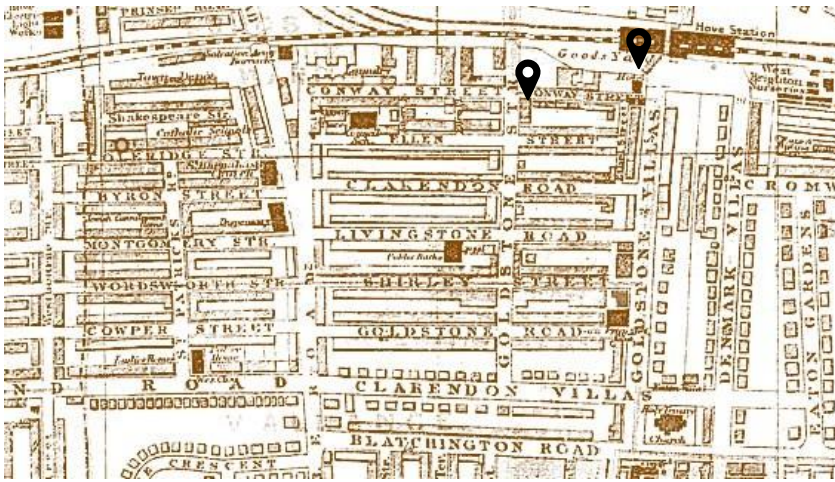


2620 Development Area 6 (DA6) is a predominantly industrial and commercial area with Hove Station as its focus and is surrounded by 19th century residential areas. Generally, this area is perceived by the local community as run-down, declining and long-neglected by the council. In particular, the environmental conditions in the immediate vicinity of Hove Station are contrasted with the successive improvement projects which have enhanced Brighton Station.



2721 North of the railway the former goods yard was redeveloped as the low-density Sackville Trading Estate. The coal yard site south of the Trading Estate and adjacent to the railway is also being used for a variety of commercial low-density uses. The Brighton and Hove Albion Football Club Goldstone Ground was redeveloped as a retail park in 1997, with six large single storey buildings and a large surface car park. To the west and south the Newtown Road Industrial estate is dominated by low rise, low employment density industrial and commercial uses in large, mainly single-storey buildings.

Figure 4 - Poet's Corner, Sackville & Hove Station c. 1900





2922 South of the railway the bus garage was built between established Conway Street and the line. The bus company is a major local employer and provides essential community public transport services. The bus garage generates heavy traffic which can only access bus routes via the residential Clarendon Road. The worst of the 19th century terraces between Conway Street and Ellen Street were demolished - together with the Ellen Street School - in a characteristic 1970s comprehensive redevelopment project. They were replaced (within the same street grid) by mainly low employment density industrial buildings and the adjacent five 10 storey tower blocks of council flats north of Clarendon Road, with associated provision of community facilities at the junction of the Sackville Road - Honeycroft and the Vallance Community Centre.



1935 Portland Rd/School St 2018

2923 West of Sackville Road the Neighbourhood Area is bounded by the railway to the north and Portland Road on the south. The area has Stoneham Park at its core. To the east of the park the grid iron pattern of 19th century terraces housing is known locally as Poets Corner. To the west the neighbourhood is more varied as it includes the only school in the Neighbourhood Area alongside commercial and industrial development in School Road. Portland Road is one of the City's local centres and provides a wide range of retail and commercial services within walking distance of the dense terraced housing.



c. 1915 Tamworth Rd/Stoneham Park 2018

## 2.2 Social Characteristics

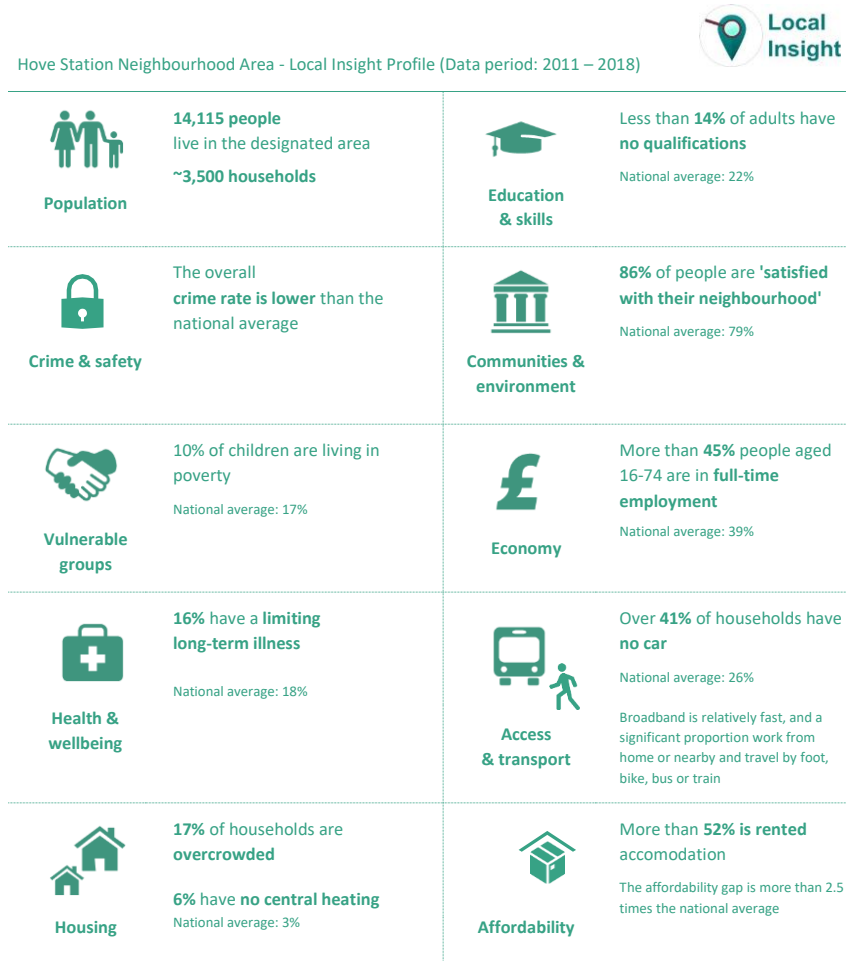


Table 3- Illustrated summary of The Local Insight Profile<sup>4</sup>

<sup>4</sup> The information below is extracted from census data and compares the period 2001-2011. More detailed and up to date information is available in the [Local Insight Profile \(November 2018\)](#).

<sup>4</sup> <https://brighton-hove.communityinsight.org/#>; Hove Station Neighbourhood report

**Population growth  
(2001-2011)**

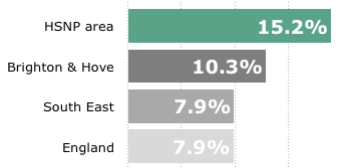


Chart 1

**Age groups  
(2001-2011) change in HSNA**

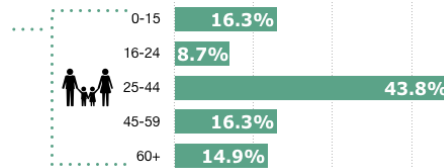


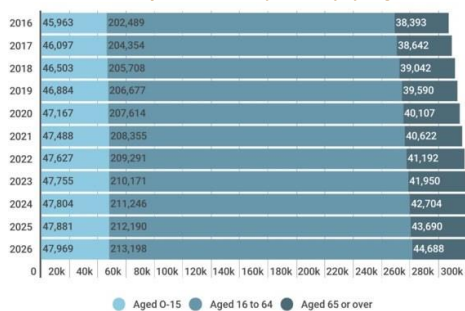
Chart 2

### 2.2.1 Population

<sup>3425</sup> The population of the Neighbourhood Plan Area has been growing steadily since 2001. The Census data, based on ward totals, shows that between 2001 and **2011** the population increased by over 15%, to **12,300** - a significantly faster rate than the city as a whole and much faster than regional and national averages. The detailed profile for Hove Station Neighbourhood Area in the local insight profile suggest a population of 14,155. This growth is assumed to be a combination of growth since 2011 and a more accurate approximation of the neighbourhood area than was possible with the census information.

<sup>3226</sup> This growth occurred before there were any significant additions to the housing stock. It was accommodated by the increase in the occupancy of pre-1919 dwellings, mainly as a result of subdivision of larger dwellings into flats and small elderly households living in terraced housing being replaced by young and growing households. This is reflected in Chart 2 which shows that the proportion of the neighbourhood population aged 25-44 in 2011 was higher at 43.8% than for the city as a whole at 32.4%, whilst the proportions in the group 45-60 plus is lower at 31.2% than the city figure of 35.4%

Chart 3 - Predicted Population Growth for the City of Brighton & Hove



~~3327~~ These trends have continued since 2011 as the area has become increasingly popular with young households. Moreover, continuing growth has been augmented by the addition of approximately 100 new dwellings - the redeveloped Gala Bingo Hall on Portland Road. The current (2017) population is estimated to be approximately **14,115 (LIP)**, some **5% of the city's total population**. Moreover, recently completed developments and the development pipeline will ensure continued increase. ~~A minimum of 250 dwelling units will be added in the next 3 years, in projects already completed/under construction, including Hyde New Wave, Newtown Road and Westows School Road, taking the total population to over 14,500.~~

~~3428~~ The **ethnic composition** of the population is virtually the same as that of the city as a whole with 12% non-white compared with the city figure of 11%. However, the significant diversity of the area is illustrated by the fact that whilst 90% of residents aged 3 and over have English/UK language as their first language, the remaining 10% comprise very small groups speaking one of 10 plus languages.

~~3529~~ The **economic activity** profile of residents aged 16-74 is also similar to the city as a whole, except for the higher proportion in full-time work (46% compared with 36%) and the lower proportion who are students (7% compared to 16%) which reflects the distance from the universities.

~~3630~~ **Household deprivation** is not a major problem, but a minority of low-income households - mainly in social rented housing and poor quality private rented flats - need a variety of social and community support services. This situation is reflected by the fact that the *former Portland Road and Clarendon Road Neighbourhood Renewal Area* - designated as a priority neighbourhood - was within the current Neighbourhood Area.

~~3731~~ Nearly half the population are not deprived in any dimension (47%) and a further 30% are deprived on one dimension. But a further 17% are deprived in two dimensions and 8% in 3 or more - many of whom are tenants in the Clarendon Road estate.

### 2.2.2 Housing

~~3832~~ Housing provision is a **major issue** for the Neighbourhood Plan as the housing provision in the City Plan is under increasing pressure from a buoyant, albeit broken, housing market in the city and the wider south-east.

~~3933~~ Most of the housing that will be in the Neighbourhood Area in 2030 is there now. There is no case for significant demolition, but there are opportunities for improving existing dwellings in terms of their streetscape and public realm and their energy efficiency.

~~4034~~ However, given changing circumstances since the designation of DA6 it is now clear that there is deliverable potential for substantially exceeding the minimum 525 units confirmed in 2016 City Plan, whilst meeting other key targets, including those for employment.

### Housing tenure and affordability

4435 The statistical data for housing tenure of the 6,100 households currently living in the area shows some significant differences from the city as a whole:

- a lower proportion of households are owner occupiers (48% compared to 53%)
- a much higher proportion are in private rented accommodation (52% compared to 30%).
- the lower proportion in social rented housing (10% compared to 15%) reflects the fact that the area has only one council estate – Clarendon Rd/Conway St

4236 In the context of a dysfunctional housing market in the city (and elsewhere in the south-east) home ownership is now beyond the reach of an increasingly high proportion of local households. New housing, at prices relatively affordable to households wanting to move into the city is increasingly attracting relatively affluent households into the Neighbourhood Area, not least because new developments are marketed to commuters, including by London estate agents.

4337 Moreover, since 2011 significant numbers of formerly owner-occupied dwellings have been converted to private rental and the proportion of households in increasingly expensive private rented houses and flats continues to increase. In parallel the right to buy has decreased the proportion of social rented housing.

4438 As in many other neighbourhoods in Brighton and elsewhere in the South- East with good access to the rail network, a process of **'gentrification'** is underway. Local households with modest resources wanting to purchase their own home are faced with rapidly increasing house prices and are under increasing pressure to move west from central and west Hove to Portslade and beyond.

4539 Households which choose or are forced to rent are having to allocate an increasing proportion of their disposable income to rent for properties which vary in quality from the high standard modern blocks in the Eaton Road and The Drive areas to poor quality flats in Houses in Multiple Occupation (HMOs) and low-grade conversions elsewhere.

4640 Our community engagement work demonstrates that there is growing concern about housing affordability and strong local support for the City Plan target of 40% affordable housing. There is also an issue that the Government's definition of 'affordable housing' includes housing that can be up to 80% of market prices or rents and which is therefore not genuinely affordable to the majority of local households in need. BHCC's policy guidance aims to secure a high proportion of affordable housing to rent at levels at or below the ceiling for housing benefit (Local Housing Allowance) working in partnership with Registered Providers. However, this is always subject to the viability of individual housing developments.

4741 In the context of these trends, there are three key Neighbourhood Plan issues:

- can the NP develop policies/projects which will enable the City Plan target of 40% affordable housing to be achieved in new development across the Neighbourhood Plan Area in ways which delivers a high quality and inclusive neighbourhood?
- can the NP develop policies / projects for community led housing that yield higher than 40% affordable units and contribute to genuinely affordable units in perpetuity?
- can the NP develop policies and/or projects which will improve the condition of the lower quality terraced housing stock, particularly that in the private rented sector, including environmental/public realm improvements and action to promote energy efficiency?

### Housing need and DA6 capacity

4842 The projected **housing need** for the city over the period 2010 – 2030 was estimated in the City Plan as 30,120 dwellings. The City Plan (Policy CP1) makes provision for at least 13,200 dwellings. During the period 2010 – 2019 housing delivery has been 3,833 net dwellings. A failure to maintain the nationally required 5-year housing supply has a major impact on the determination of planning applications. There is a need to maximise the overall housing supply (above the minimum City Plan target where possible) and also to increase annual housing delivery.

4943 However, at this same time the **minimum** amount of housing development proposed for DA6 in the City Plan Part 1 was reduced from 630 to 525 units when the landowner made it clear to BHCC that there was no prospect of redeveloping the Goldstone Retail Park within the plan period. Applying Policy CP20 of the City Plan would mean that 210 units should be affordable.

5044 The City Council has now recognised the scope for further development in the area and has in the ~~emerging~~ City Plan Part 2 (adopted in October 2022), ~~identified~~ allocated the Sackville Trading Estate and the former Coal Yard as suitable for a mixed-use development increasing capacity by at least 500 dwellings. This provides a welcome boost to the City housing supply. The Forum believes that best use must be made of brownfield sites to maximise potential housing potential in the city.

5145 Thus, the scale of new housing provision as a component of regeneration is a major issue for the Neighbourhood Plan.

5246 North of the railway by 2015 planning approvals had already been given for 44% of this minimum target; 148 in the mixed-use redevelopment of the Sackville Trading Estate and 62 in the Hyde New Wave project in Newtown Road project. The latter proposal has been implemented while the former permission lapsed and has been replaced by the much larger MODA scheme, where permission was granted in 2020 for 564 residential units (built to rent) together with 260 care community units over 5000 sqm of offices, almost 700 sqm of flexible retail and some 950 sqm of community and leisure floorspace.

~~5347~~ South of the railway DA6 policy requires 200 residential units in the part of DA6 which is within the Conway Street Industrial Area. But landowner proposal developed in consultation with the Neighbourhood Forum, have demonstrated the feasibility of delivering a higher number of dwellings, especially when the whole of the DA6 south area is taken into account.

~~5448~~ Thus, it is clear that the DA6 minimum target in the City Plan Part 1 of ~~550~~~~525~~ housing units by 2030 is easily achievable. A minimum of 500 additional units have been identified in the ~~emerging~~ City Plan Part 2 on the Sackville Trading Estate/Coal Yard site. Given the city's worsening housing crisis, both in terms of numbers and affordability, there are three key issues for the Neighbourhood Plan:

- can the regeneration of DA6 deliver more than the minimum number of units specified in the City Plan, whilst meeting the 40% affordability target?
- how should the delivery of new housing be phased across the Neighbourhood Plan Area?
- can a significant increase in housing provision be delivered whilst meeting employment land and local jobs targets?

## 2.3 Local Economic Activity

~~5549~~ The retention and enhancement of substantial employment in the area is a major **issue** for the Neighbourhood Plan as it is a strategic requirement of the City Plan and important for local residents and businesses

~~5650~~ Economic activity in the Neighbourhood Area is concentrated in the industrial and commercial development within DA6, particularly that close to Hove Station (including Conway Street, the Hove Business Centre and along Newtown Road) and the commercial and retail development in the Portland Road/School Road area.

~~5751~~ Given the need to provide employment for the city's growing population, the City Plan emphasises the need to protect employment floorspace in the area and provide new, high quality employment opportunities for the city. Hence the DA6 regeneration strategy aims to '*...promote the efficient use of land through, predominantly employment and residential, mixed use developments.*'

~~5852~~ The quantitative employment space requirements established by DA6 overall are:

- the retention/replacement of 12,000m<sup>2</sup> employment floor space *within the Conway Street Industrial Area* - a reduction from 18,700m<sup>2</sup> identified in the *Employment Land Study 2006* which is predicated on shifts to employment uses with higher job densities;
- *outside the Conway Street area*, the retention/replacement of existing floor space (primarily the 16,000sqm of the Newtown Industrial Estate and some 5,000sqm in the Sackville Trading Estate) with an additional 1,000sqm floor space.

~~5953~~ The **qualitative employment space requirements** focus on a shift into high quality flexible office/business (B1) floorspace which includes both '*...larger floor plate*

offices and affordable business floorspace suitable for small businesses and the digital media/creative industries’

<sup>6054</sup> The development pipeline in DA6 indicates that these employment floor space targets can be met by the high-quality design of a series of mixed-use redevelopment projects, which also include substantial housing provision.

<sup>6155</sup> Thus, **within the Conway Street Industrial Area** the ~~approved~~ high density ~~Matsim~~ Hove Gardens project ~~comprises 216 residential units along with 1,662m<sup>2</sup> office space and 341m<sup>2</sup> community space proposed 1,988m<sup>2</sup> of B1 office space along with 186 apartments and 226m<sup>2</sup> retail~~ – all in less than 15% of the area. **Outside the Conway Industrial Street area**, the ~~approved proposals for~~ MODA ~~development is replacing would replace the existing the~~ 5,000m<sup>2</sup> of the Sackville Trading Estate and delivering employment and amenity accommodation to create an estimated 450-500 jobs. The scheme ~~would also deliver~~ involves the construction of 564 private build to rent flats and ~~over~~ 260 community care units.

<sup>6256</sup> Moreover, our community engagement work indicates that there is strong support for this type of project which delivers modern local employment opportunities, integrated with substantial new housing development and some enhanced retail provision.

<sup>6357</sup> Given the increasing market and policy pressures to provide new housing in strategic brownfield sites, can both the number of jobs created, and the number of houses provided be greater than that proposed in the City Plan i.e.

- can the job creation outcomes (both quantitative and qualitative) be enhanced by the mixed-use regeneration of the whole of DA6, including the longer-term regeneration of those which are currently allocated for continued low employment density uses?

### Creative industries sector

<sup>6458</sup> The City Plan intends to enable DA6 to become increasingly important for accommodating creative industries in premises which are more affordable than the city centre for the smaller/micro businesses which characterise the sector. It refers to, but does not identify, ‘... an existing small cluster of creative industries’ in the area and emphasises ‘...the importance of early identification of the location and volume of flexible employment space needed for this sector to form a ‘cluster and critical mass’.

<sup>6559</sup> The provision of affordable premises for small and diverse creative industries is an important **issue** for the Neighbourhood Plan, as this will make a major contribution to the character and vibrancy of a regenerated Hove Station Area.

<sup>6660</sup> Our community engagement work with local leaders in this sector has identified two small clusters in DA6 - businesses accommodated in the BHCC owned Industrial House (likely to be redeveloped in the Plan period) and the 12 plus businesses in the Stockwell Lodge Studios at the west end of Conway Street (outside the Conway Street Regeneration Area).



6761 Given that the existing provision is in small clusters, the Neighbourhood Plan should determine:

- whether a single large new cluster is appropriate to create and feasible for provision both north and south of the railway in DA6, as integral components of mixed-use redevelopment projects; and
- the scope for the short-term use of properties in the redevelopment pipeline either for employment or housing use.

## 2.4 Community Infrastructure and Environment

6862 The potential increase in population of some 3,000 – 3,500 people which will be brought about by the regeneration of the Neighbourhood Area will bring with it increased demands on community facilities, health and social services provided by both the statutory and voluntary sectors. Our community engagement work has demonstrated that this is a **major issue** for the Neighbourhood Plan which residents want to see effectively addressed.

6963 **School provision** within the Neighbourhood Area is limited to the West Hove Primary School in School Road, which primarily serves the area west of Sackville Road. The St Andrews Primary School is just outside the southern boundary of the Neighbourhood Area and serves the needs of families living east of Sackville Road. The new bi-lingual school in Hove Park is providing places for an increasing number of students

7064 Our community engagement work has shown that the issue of whether or not a new primary school could or should be provided within the regeneration of DA6 is an issue which the NP needs to address.

7165 **Health provision** has recently been enhanced by the imaginative conversion of the former Holy Trinity Church on the corner of Goldstone Villas to a major NHS health centre. Together with other existing provision, GP services south of the railway are likely to be able to support the substantial increase in population.

7266 Similarly, the new Health Centre incorporated in the recent redevelopment of the Gala Bingo Hall has ensured excellent provision of health services west of Sackville Road. However, there has been no recent new provision north of the railway.

7367 The Clinical Commissioning Group (CCG) stated in their comments on the MODA planning application that it is unable to predict whether or not the proposed development will negatively affect local practices, as they are independent businesses and will be better placed to assess their current and future capacity.

7468 Thus, an assessment of health provision to meet the needs of the integrated development of DA6 north of the railway is essential.

7569 **Community facilities.** Our analysis has identified several existing and emerging **community hubs** – at Hove Station, Conway Street- Sackville Road and Stoneham Park Area - where there are concentrations of social/ community services and retail facilities along with some micro-businesses – all of which provide services which are important for the quality of life in the area.

7670 Our community engagement work has demonstrated support for a consolidation/enhancement of these hubs and the case for these locations to be priority areas for some of the local investment of developer contributions.

7771 **Green infrastructure.** Whilst most of the area is well served by its proximity to Hove Park and Hove Recreation Ground, there are no small-scale, green public realm areas in the dense terraced housing areas south of the railway. The streetscape of these terraced areas has either never included trees or, in the case of the street of larger terraces and villas, has lost some or all of the original provision, which is significant characteristic of Hove residential areas.

7872 ~~A recently completed tree-planting scheme in Marmion Road~~ Several tree planting schemes in the Poets' Corner area and Portland Road (as a partnership between Hove Civic Society, local residents and BHCC) ~~has~~ have started the process of re-provision.

7973 Thus, there is a need and an opportunity to enhance the green infrastructure through the introduction of small-scale 'pocket park' type green public realm and a street – by street tree-planting scheme.

8074 **Carbon footprint.** There are a variety of opportunities to reduce the carbon footprint of the Neighbourhood Area. These include improving the poor energy efficiency of the 19<sup>th</sup> century terraces, encouraging the uptake of domestic energy generation, promoting the highest possible standards of energy and water efficiency and waste management in all mixed-use regeneration projects, and taking all possible measure to move towards more sustainable modes of transport.

8175 The Forum's **Community Energy Kickstart Pilot Project**, in partnership with BHESCO (Brighton & Hove Energy Services Co-op), has raised awareness of the scope for improving the energy efficiency and renewable energy regeneration of the 19<sup>th</sup> century buildings in the area.

8276 Our community engagement work demonstrates the need to apply, as far as possible the principles of Low Carbon Neighbourhood Planning.

## 2.5 Transport & Movement / Connectivity

8377 Moving towards sustainable development requires policies which address the issue of how people move around in and out of the Neighbourhood Area and particularly the barriers to movement caused by the railway line and the legacy of the development of the coal yard and goods sidings north of the railway.

### 8478 **Public Transport and the Role of Hove Station:**

Hove Station is an important local transport interchange and hub within the City and provides access and egress to other significant destinations within the Greater Brighton City Region and beyond e.g. London. The BHCC Local Transport Plan [LTP4] recognises the importance of connecting people with train stations as a form of interchange, and identifies the need for the development of an Interchange Strategy. The number and quality of routes to and from Hove Station will therefore be an important influence on its use and success, and therefore redevelopment proposals should take full account of City Plan Part 1 Policy CP9 (especially section A.2a), as well as research such as 'Fixing the Link' by the 'Campaign for Better Transport'.

#579 **Road network and traffic.** Traffic generation from within the area is relatively modest. This reflects the relatively **low levels of car ownership**. In 2011 some 2,500 (40%) of households did not have a car or van – slightly less than the city-wide level, which in turn is significantly less than for England as a whole. **In 2011, Journeys to work** were relatively short for almost half local residents – 21% were less than 2 km and a further 25% were less than 5km. Only 9% travelled 20km - 60km and just 13% travelled more than 60km. However, it is likely that the proportion of long-distance commuters has increased significantly since 2011.

#680 In this context, just over one third of journeys to work are by car (36%), compared to 56% by sustainable transport - public transport (31%), walking to work 19% and cycling to work (6%). Some 7% of residents work from home. The fact that 25% of residents walk or cycle to work reflects the availability of local jobs both within and in the vicinity of the Neighbourhood Area.

#781 **Traffic generated from outside the area** dominates vehicular movement. The main east west roads – the Old Shoreham Road, Portland Road-Clarendon Road - Eaton Road and north-south roads - Sackville Road and The Drive all carry heavy peak hour volumes. A particular issue within the area is the volume and speed of traffic going through the area down Fonthill Road and threading through the residential environment of the tower blocks to either Goldstone Villas or Sackville Road – using the same streets that give access to the main road network for buses from the bus garage. The speed of traffic along a major ‘rat-run’ between The Drive and Sackville Road - Wilbury Avenue/ Newtown Road - is an issue for residents, as is the difficult junction between this route and Fonthill Road. The use of the more minor roads as ‘rat-runs’ is an issue in many streets in the grid-iron terraces south and west of DA6.

#882 Traffic volumes and the related issue of parking provision are a major concern to local residents and businesses. What the NP can and cannot do to address these issues, in the context of a major increase in the density of land use which the implementation of Policy DA6 will deliver, has to be identified and made clear in the NP.

#983 **Connectivity within the Neighbourhood Area east of Sackville Road** is a major issue. The current situation severely restricts the potential for regeneration to deliver an integrated mixed-use area in a pattern which encourages journeys on foot and by bike, especially to and from the Hove Station transport interchange. The railway line restricts access north-south movement to the Fonthill Road tunnel and the Hove Station footbridge.

9084 **The tunnel on Fonthill Road is a north-south link available to pedestrians**, but it is pedestrian hostile, with uneven and narrow footpaths between the damp walls and the noisy fast-moving traffic and it visually unpleasant, with poor standard strip lighting.

9185 **The footbridge at Hove Station** is the major north-south pedestrian link, but it is poorly maintained and the absence of lifts at either end render it unusable for wheelchair uses, totally inadequate for people with disabilities and grossly inconvenient for people with luggage, heavy shopping bags or prams.

9286 North of the railway there is a substantial difference in level between the former eCoal Yard and the Trading Estate (the former goods yard) and Newtown Road and thus no east- west connection between Newtown Road and Sackville Road - the result of constructing the original rail system on the side of a valley.

9387 Thus, a major issue for the Neighbourhood Plan is the need to substantially improve connectivity within the area in order to realise the potential for the integrated, rather than piecemeal, redevelopment of DA6. The two *major and related issues* are:

- i the impact of the increased population and economic activity on the surrounding road network, including congestion, safety, accessibility and permeability; and
- ii the effective management of parking provision.

## 2.6 Neighbourhood Plan Sub-Areas – The Neighbourhood Plan Jigsaw



<sup>9488</sup> The Neighbourhood Plan boundary defined by BHCC includes a series of distinct sub-areas with specific characteristics, planning issues and development potential/pipeline - see interactive maps at [hovestationforum.co.uk/map/](http://hovestationforum.co.uk/map/)

<sup>9589</sup> The following analysis profiles each of them as an input to the development of the vision, strategic objectives and policies of the Neighbourhood Plan. It is informed by our community engagement over a five-year period with residents, local businesses, landowners, local VCS organisations and several BHCC departments.

<sup>9690</sup> This section is also informed by reference to the analysis of neighbourhood typologies presented in **The Urban Characterisation Study (2009) Brighton & Hove City Council**<sup>5</sup>

### 2.6.1 DA6 North of Railway

<sup>9791</sup> This area is within the [Hove Park-Goldsmid](#) Ward and all of it is in private ownership.

<sup>5</sup> <http://www.brighton-hove.gov.uk/content/planning/heritage/urban-characterisation-study>

## Sackville

~~9992~~ This sub-area comprises the Sackville Trading Estate and the former Coal Yard. Planning approval for comprehensive mixed-use development was given in 2020 to MODA for 564 residential units (built to rent) together with 260 care community units, over 5000 sqm of offices, almost 700 sqm of flexible retail and some 950 sqm of community and leisure floorspace.



~~9993~~ **Sackville Trading Estate** was developed on the former goods yard site in the 1970s – a low density mixture of retail, warehousing and light industry. A 2008 planning permission was renewed in 2012 for a mixed-use redevelopment project entitled ‘Sackville Place’ which included:

- a new public square and 2,200 m<sup>2</sup> of flexible B1 office accommodation;
- a foodstore (5,488m<sup>2</sup>), large format non-food retail units (5,115 m<sup>2</sup>);
- and other retail uses A1-A5 (1,100 m<sup>2</sup>);
- 148 residential apartments above the retail space - approximately 40% affordable;
- landscaped roof gardens providing a range of semi-private garden space for the apartments;
- improved vehicular access from Sackville Road and 571 underground car parking spaces, secure cycle parking and taxi waiting area. Significant public realm enhancements to Sackville Road and to public transport facilities.

~~40094~~ This project has not been implemented but was the first exemplar of the type of high density, mixed use redevelopment which policy DA6 promotes.

~~40495~~ An issue for the Neighbourhood Plan is that the substantial buildings are now largely empty pending redevelopment. They have the potential for interim uses on short leases at low rents, which could be helpful in relocating/encouraging the development of small businesses, not least in the creative industries sector. It could also include housing.

~~40296~~ **The Former Coal Yard** was acquired by the Coal Board Pension Fund in March 2013 for the modest sum of £1.3m, which reflected the designation of the site for Waste Management purposes in the draft East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites plan.

~~40397~~ The Forum organised a petition in 2016 for the withdrawal of the waste management allocation and the mixed-use redevelopment of the site. This attracted some 600 signatures from the surrounding residential areas and demonstrated the support for the Forum’s vision of an integrated Hove Station Quarter, which had emerged from previous community engagement work.

~~10498~~ Both the Sackville Trading Estate site and the Coal Yard site are now included in Policy SSA4 in the ~~emerging~~ City Plan Part 2 which provides for an additional 500 units on top of the 525 set out in the City Plan Part 1. This is welcomed by the Forum.

~~10599~~ *The key issue for the plan is to develop policies and illustrative projects which will promote the delivery of the mixed-use redevelopment of the Sackville sub-area, in ways which improve connectivity with Newtown to the east and Hove Station Hub to the south-east and the redevelopment of DA6 south of the railway.*

### Newtown

~~106100~~ The Goldstone Retail Park was built on the site of Brighton and Hove Albion Goldstone Football Ground. The large retail sheds and car park have left no vestige of the former use, despite its iconic, historic and cultural significance to many thousands of the city's football fans. The new use has caused substantial noise problems in the adjacent residential street.



~~107101~~ The Forum has created an illustrative 'blue skies' vision of how this area could be more appropriately redeveloped in the long term, through a design which, inter alia, commemorates its role in the city's history.

~~108102~~ *The issue for the Neighbourhood Plan is the need to explore the long-term feasibility of a second redevelopment of this site in the context of an integrated, mixed-use redevelopment of the whole of DA6. See PART TWO of the Neighbourhood Plan for more details.*

### Fonthill Wilbury

~~103~~ This area of high-quality terraces, semi-detached and large detached 19<sup>th</sup> Century villas, is increasingly being converted into up-market apartments, for both sale and private rental. It is a high-quality urban environment with wide tree-lined streets with excellent walking distance access to both Hove Park and the Hove Station shops and pubs. A survey of residents (by Conservative Party councillor candidate) showed no support for Conservation area designation.



~~109104~~ *The issues are volume and speed of traffic on Wilbury Ave/Newtown Rd and Fonthill Rd and the pressure on the junctions between the two and between Fonthill Rd and Old Shoreham Rd – conditions which could be seriously worsened by the large-scale redevelopment of DA6. Also, the depletion of trees could be reversed to restore the original Victorian tree-scape.*

## 2.6.2 DA6 South of Railway

~~444105~~ This area is within the Goldsmid Ward. The area is in mixed ownership primarily by the following major landowners:- ~~Watkin Jones~~ Legal & General, Matsim, the Brighton & Hove Bus Company, Network Rail and the City Council.

### Hove Station Hub

~~444106~~ This is a major transport hub that has had very little investment for many years until the very recent private investment in the small-scale retail and commercial buildings immediately north and south of the footbridge. All of the Hove Station Conservation Area north of Clarendon Road, with the listed buildings of the station and footbridge are within this sub-area. The area includes shops, small businesses, cafés, bars and pubs. It is badly in need of a major environmental public realm uplift and improved segregation of pedestrian and vehicular traffic.



~~444107~~ The Forum has developed an outline project demonstrating the potential for adding lifts to the bridge and organised a petition to request improved maintenance of the bridge and the provision of lifts. The petition generated over 500 signatures and was presented to BHCC.

~~444108~~ *The issue for the Neighbourhood Plan is to develop a policy and indicative projects for an integrated environmental project which will improve the public realm, enhance the immediate setting of the listed buildings and make the interchange more pedestrian and cycle friendly – and thus underpin recent and attract further private investment. We refer to this as the Hove Station Community Hub.*

### Conway Street/Ellen

~~444109~~ As result of the 1970s comprehensive redevelopment this run-down area, adjacent to Hove Station, comprises mainly low density and deteriorating industrial buildings and the mainly high-rise Clarendon- Ellen housing estate. Buses can only access bus routes via the residential Clarendon Road and Fonthill Road traffic uses the same routes through the area. The major landowners are the Bus Company, Legal & General, Matsim and BHCC. Policy DA6 includes the comprehensive redevelopment of the Conway Industrial Area (CIA) and states as its first priority ‘...the preparation of guidance to promote and co-ordinate employment focusses mixed-use regeneration of underused land and buildings...’



~~444110~~ A range of council sponsored community facilities were provided in the redevelopment at the junction of the Sackville Road - Honeycroft and the Vallance Community Centre- which together with the adjacent small shops, the Salvation Army complex, a cluster of small businesses and the Church constitute a locally significant community hub between the Conway Industrial Area and Sackville Road.



446111 *The major challenge for the Neighbourhood Plan is to create a detailed policy framework and an illustrative Concept Plan which will establish the basis of the Conway Street Master Plan for the phased, integrated redevelopment of the whole of DA6 South, with improved connectivity to redevelopment north of the railway. In early 2018 BHCC decided to produce such a Master Plan which eventually will be has since been adopted as a the Hove Station Area Supplementary Planning Document (SPD18)*

### Goldstone - Clarendon

447112 *This terraced housing area between Clarendon Road and Clarendon Villas is unlikely to be the subject of significant change during the Plan period. The recent increase in private investment in improving the 19<sup>th</sup> century houses is likely to continue as the area is increasingly popular with couples. The area has walking distance access to Hove Station and residents would benefit from the improvement of the Hove Station Community Hub.*



448113 *The issues for the Neighbourhood Plan are residents' concerns that existing problems of traffic management (especially parking and rat-running) will be exacerbated by the regeneration of DA6; the scope for improvement in streets where the public realm is run-down, and which are virtually devoid of trees and the promotion of energy efficiency improvement in the housing stock and renewable energy generation.*

### Denmark –Eaton

449114 *This is an area of high-quality terraces, semi-detached and large villas, some converted into apartments. Good quality urban environment with wide tree-lined streets and excellent access to services. Dominated by designated Conservation Areas but with several large blocks of apartments produced by redevelopment of villas in the 1970s and '80s. The area has excellent walking distance access to Hove Station and residents would benefit from the improvement of the Hove Station Community Hub.*



420115 *The issues for the Neighbourhood Plan are the potential for limited streetscape improvements and the promotion of energy efficiency improvement in the housing stock and renewable energy generation.*

## Stoneham

~~123~~116 This sub-area has Stoneham Park at its core. East of the park the grid iron pattern of 19<sup>th</sup> century terraced housing is known locally as Poets Corner and is in the Westbourne & Poets' Corner Ward. To the west the sub-area is in Wish Ward and is more varied. It includes the only school in the Neighbourhood Area alongside the Westermanns complex in School Rd which is designated in City Plan Part 1 Policy CP3 as employment-led (residential and employment) mixed use development. However, the area was approved for housing with limited employment space (104 dwellings and 572m<sup>2</sup> of office space) which has now been completed.



~~123~~117 A 2014 survey by local residents - supported by the Forum - identified a major concern: the erosion of community facilities run by third sector non-statutory organisations due to small-scale plot-based redevelopment which is replacing a variety of commercial land uses to high density infill housing. Since then the YMCA and other small sites have been redeveloped for housing and has become a major concern of the West Hove Forum.

~~123~~118 Along the southern boundary Portland Rd is one of the City's local centres and provides a wide range of retail and commercial services within walking distance of the dense terraced housing. This 19<sup>th</sup> century linear development is somewhat rundown in places, with potential for environment/public realm improvement.

~~124~~119 *The issues for the Neighbourhood Plan are:*

- *whether it is possible to constrain the erosion of small-scale non-housing uses which are a valued characteristic of the neighbourhood?*
- *how alternative premises can be found for small scale creative enterprises and community facilities which are displaced by redevelopment?*
- *how the Portland Rd local centre can be enhanced by public realm improvements?*

SECTION 3

## Vision and Strategic Objectives



### VISION

The overall aim of the Plan is to facilitate the regeneration of the Hove Station Neighbourhood Area in a way which realises its potential by creating a vibrant and inclusive community, focused on a new Hove Station Quarter, as a great place to live, work and relax.

Thus, the Plan aims to achieve the following objectives...

## Strategic Objectives

- ✦ A strong and diverse community through the provision of a wide choice of housing and local community facilities;
- ✦ Mixed but complementary land uses, including both residential development and substantial employment opportunities not least the creative sector;
- ✦ Better connectivity and permeability through the area – especially across the railway divide - prioritising opportunities for sustainable travel (i.e. public transport, cycling and walking);
- ✦ An urban character which draws on inspiration and enhances historical design/architectural legacy;
- ✦ “Urban” high density: mid-rise development as standard with high-rise developments in key locations including signature projects;
- ✦ Housing with varied types, providing good space and sustainability standards, which maximise provision of affordable housing;
- ✦ New and improved social, health and community facilities, school places and nurseries, as needed for the increased population;
- ✦ Green, natural and attractive spaces for communal activities and improved public realm;
- ✦ Reduced carbon emissions through low carbon new buildings, improved energy efficiency of existing buildings, sustainable and local generation and use of renewable energy.

[125120](#) Our vision for the areas north and south of Hove Station, Development Area 6 of the City Plan (DA6), is that it will undergo wholesale redevelopment during the plan period (up to 2030) in a way that will establish Hove Station Quarter. The remaining areas of the Hove Station Neighbourhood will be subject to less change, but the NP puts forward some important proposals that will ensure *the entire NP area* benefits from the regeneration process. The statutory Part One NP sets out policies which provide a framework for achieving the objectives. The Forum’s vision for the area is further developed through [PART TWO Part Two](#) of the NP.

[126121](#) The HSNP vision, strategic objectives and policies have evolved through a process of community engagement which has been sustained over five years. This has demonstrated the desire of the local community to influence the regeneration process so that it delivers benefits to existing residents, new residents and the city as a whole. A full account of community involvement in the plan preparation can be found in the Consultation

Statement.

~~127~~<sup>122</sup> Moreover, in accordance with best practice advice from Locality, the Forum has been working closely with a number of landowners as key NP stakeholders, in a process which has identified common and complementary objectives, whilst aiming to secure the maximum public benefit from the regeneration of one of the biggest brownfield areas in the city. This co-operative work provides evidence which supports the Forum's view that progress can be faster and more comprehensive than that anticipated in the City Plan Part 1, as landowners now bring forward major projects that will transform the entire area.

~~128~~<sup>123</sup> Thus, since Autumn 2014 the Forum has consistently put the case to Council officers and politicians that the delivery of its vision of a Hove Station Quarter will require the development and delivery of a Master Plan for the whole of DA6. In this context the Forum secured support from the then DCLG to produce a Concept Plan which is set out in the non-statutory part (Part II) of the NP, as the first stage in the development of a full Master Plan for the integrated redevelopment of DA6 that would fully establish the Hove Station Quarter. This **Concept Plan** brought together the work carried out by Forum members, (notably David Kemp architects, who has suggested an outline design for the former Albion football ground and now Goldstone Retail Park) the outline designs of LCE architects provided by ~~MATSIM~~ Matsim for the area south railway and ~~MOUNTPARK~~ Mountpark's initial design for the Sackville trading estate / Coal yard area.

~~129~~<sup>124</sup> In developing our vision, we have had the benefit of discussing several major proposals from three land owners and have the opportunity to comment on them as they are progressing. They are the proposals by:

- MATSIM for an area south of the railway station to the South of Conway Street – the Hove Gardens project. This was refused by the Council in June 2017 but was approved by a Government Planning Inspector following appeal in January 2019.
- MATSIM subsequent phases of redevelopment of their land holdings south of the railway station, incorporating also a reconfiguration proposed by BRIGHTON AND HOVE BUS AND COACH COMPANY of the bus station and its land requirements in the area.
- MOUNTPARK preliminary proposals to redevelop the Sackville trading estate together with the coal yard site, which together represents one of the major brownfield sites in the city.
- MODA - who have succeeded MOUNTPARK - obtained permission in 2020 for major redevelopment of the Sackville Trading Estate including the coal yard site.

~~130~~<sup>125</sup> In total these proposals on their own would generate residential and employment uses substantially in excess of the minimum figures specified in the City Plan Part 1 and ~~the emerging~~ City Plan Part 2.

~~131~~<sup>126</sup> The key challenge for a Master Plan for the Urban Quarter is to make sure that whatever timescale is required for developing the various land holdings that ultimately, they fit together seamlessly as an urban jigsaw. That means that transport links work well, that there is an overall recognisable signature to new development: high quality, a high degree of greening up, areas that people like to walk and cycle through that are pleasant, comfortable and safe.

~~132~~<sup>127</sup> A particular challenge is our desire to make Hove Station the natural core of the area

although the station is geographically offset to the east. It must be easily accessible as the centre of the new Hove Station Quarter. We believe that new development across the development areas needs to be accompanied by major environmental improvements to the front of the station area, to surrounding streets and to the links across and underneath the railway. We also believe that redevelopment of the area provides much needed opportunities to traffic calming.

132128 In December 2017 the Council submitted a bid to the One Public Estate Programme and was allocated £75,000 to prepare a **Master Plan for the Conway Street Regeneration Area** which is part of DA6 South of the Railway. We believe that this is a successful outcome of the neighbourhood planning process to date and is a significant step towards a deliverable Hove Station Quarter. The emerging Neighbourhood Plan and the Concept Plan provided a community- led development framework and starting point for this Master Plan which ~~will be was~~ prepared alongside the final stages ~~in the process of securing the adoption~~ of the Neighbourhood Plan ~~process~~. ~~The Council has committed to Hove Station neighbourhood Forum being a partner and not merely a consultee in this process. Hove Station Neighbourhood Forum was an active partner in the preparation of the Master Plan which was formally adopted by the Council as a supplementary planning document titled SPD18 Hove Station Area on 16 September 2021.~~

133129 The Neighbourhood Plan applies the principles of planning for sustainable urban regeneration to develop policies for a green Hove Station Quarter, as a contribution to the transition of Brighton and Hove to a carbon neutral city.

134130 A combination of interlinked neighbourhood policies enhance City Plan policies to deliver the economic, social and environmental benefits of sustainable urban development. In particular, in conjunction with City Plan policies, NP policies aim to minimise the carbon footprint of the high density, mixed use redevelopment of DA6, by reducing CO2 emissions from energy consumption in buildings and from vehicles, together with the provision of community and green infrastructure.

## Towards a Green and Sustainable Hove Station Quarter

### High density, mixed use, comprehensive redevelopment of DA6

- The high-density redevelopment of the underused brownfield sites reduce pressures for **housing development** on urban fringe greenfield locations, which often have negative impacts on the natural environment and are less well located for sustainable transport.
- Sustain social diversity by the provision of a variety of **housing tenures and types**.
- The provision of substantial high-density **employment opportunities** which are accessible by public transport, cycling and walking - thus reducing journeys to work by car. High **quality urban design**, to create safe, attractive, convenient, well connected streets and spaces.

### Traffic and movement

- Minimising the increase in cars brought into the area by the 1,300 or so incoming households by promoting essentially **car free new development** with minimum on-site car parking provision.
- Encouraging existing car owners to reduce the number of shorter journeys they make, by improving **walking and cycling routes** and access to the Hove Station **public transport hub**.
- Minimising overspill parking from major developments into adjacent neighbourhoods by the development of a **parking and traffic management** scheme for the whole NP area.
- Reducing air pollution by providing the infrastructure for the change to **electric vehicles**.

### Community and social infrastructure

- The development of Community Hubs as **neighbourhood focal points** which provide varying combinations of shops, businesses, and community facilities within walking distance of both existing and new housing.
- Promoting **continuing community engagement** in the implementation of the NP, through the development of community-led projects to enhance the social sustainability of these shared neighbourhood places.

### Green infrastructure for health and wellbeing

- **Green energy policies** - high energy efficiency standards for new buildings, coupled with green energy generation and energy efficiency investment in existing housing.
- Enhancing the natural environment and biodiversity with high quality **landscaping** within major development, including green roofs and food growing areas.
- Improving the **public realm** by the provision of on-street trees, pocket parks and other public green spaces for healthy exercise and recreation in an area with relatively few private gardens.

## SECTION 4

## Policies

### Coordinated and integrated comprehensive redevelopment of City Plan Development Area 6

**Commented [RD3]:** Converted from paragraph to sub-heading

The City Plan, Development Area 6 (DA6) proposes major redevelopment over the plan period. On examining the area closely and by working with the major local landowners we have found that the opportunities are more substantial than previously assumed and that development is also more likely to come forward more speedily than anticipated in the City Plan. The ~~emerging now adopted~~ City Plan Part 2 ~~and Hove Station Area SPD has acknowledged~~ acknowledge this position. The policies of this plan aim to steer development so that it results in a well-designed, coherent and integrated new quarter for the City. Unless policies refer specifically to DA6 they apply to the entire neighbourhood plan area.

#### Policy 1: Creation of the Hove Station Quarter

Development proposals in the area ~~shown as comprising~~ DA6 in the City Plan Part One will be supported ~~only~~ if they demonstrate a comprehensive and integrated approach ~~aiming to support~~ ing the creation of Hove Station Quarter with a strong relationship to the station. The Hove Station ~~Master Plan / Area SPD will provide~~ site by site development management guidance ~~based on the framework of City Plan and is supported by relevant~~ Neighbourhood Plan policies.

The area ~~shown in the City Plan identified~~ as DA6 will be suitable for a mix of uses comprising residential, commercial, small retail and cultural uses including small workshops. ~~A horizontal mix of uses such as ground floor office / commerce with residential above will be encouraged in appropriate locations to increase interest and attraction at ground floor level. Individual proposals should make efficient use of land and be integrated to achieve a well-functioning, high quality, inclusive and vibrant Hove Station Quarter.~~

To increase interest and attraction at ground floor level, high quality, proposals for ground floor employment uses with residential above will be encouraged. Proposals designed to create an efficient and well-functioning Hove Station Quarter that are inclusive and vibrant will be supported.

Development proposals ~~need to be sympathetic to and reflect the need for which~~ provide sustainable area-wide transport and movement linkages, unifying design features and neighbourhood facilities as indicated in Hove Station ~~Area Masterplan / SPD will also be supported, and in the diagrams below (p.47) and in PART TWO of this document. Significant departures from these principles will need to be justified.~~

Where Proposals for appropriate interim uses for land and buildings where site assembly and phased redevelopment is awaited will be encouraged, entails buildings standing empty for some time developers are encouraged to find suitable short term uses for such buildings including housing.



~~437~~132 Reason: There is a great opportunity for rejuvenation of this area which should take advantage of Hove Station as a sustainable transport hub for the city.

~~438~~133 Hove Station, although geographically off-centre should become the natural focus of the area. In addition, there will be a wide range of facilities in the area with several focal points which will provide services primarily to people working and living in the area. Of particular importance are the Community Hubs which are identified in more detail in ~~Policy 13- Policy 11: (p.68)~~.

~~439~~134 From the schemes designed to date by the major landowners in the area it is clear that there is potential for substantially more residential units than the minimum stated in the City Plan Part 1, whilst maintaining the volume of offices and increasing smaller employment generating uses including cultural uses.

~~440~~135 As a result of redevelopment existing low intensity use of land will be used more effectively. This would allow City Plan policies for employment to be met, whilst substantially increasing the volume of much needed housing. It would also allow the area of DA6 to grow into a homogenous and attractive new city quarter. The Hyde development (New Wave), together with the ~~recently approved~~ developments for Hove Gardens (~~Matsim Watkin Jones, now Legal & General~~), Sackville Trading Estate and Coal Yard (MODA) and the KAP site in Newtown Rd, together ~~have so far proposed will deliver~~ more residential units and floorspace than suggested in the City Plan Part 1 and emerging Part 2. [Table 4 below](#) sets out a summary of ~~the proposals that have been made in recent years current developments and commitments (up to autumn 2023)~~ and contrasts these with the figures in the City Plan. The table does not include any figures on the Newtown Road Industrial Area.

~~444~~136 Delivering such an increase in scale of development must include provisions of affordable homes, facilities for the community and improved public realm. It will also need to avoid major negative impacts in terms of traffic and parking. This is all dealt with in the following policies.

Table 4: Land use allocation - Summary of proposals by developers committed development compared to City Plan minimum targets for Policy DA6 area

Use	City Plan Parts I & II	Moda	Matsim Watkin Jones (now Legal & General)	Others sites	Total HSNP Planning commitments to date
	Adopted version City Plan Part 1, March 2016, (Policy DA6) <sup>6</sup> City Plan Part 2, October 2022 (Policy SSA4)	Sackville Trading Estate + Coalyard <sup>7</sup>	7 phases including Conway St, Bus Company and Clarendon Rd Blocks infill Hove Gardens (1-3 Ellen Street) <sup>8</sup> .	Indicative scheme for post office sorting and Peugeot showroom site Former Peugeot showroom (KAP Ltd) <sup>9</sup> Hove Sorting Office <sup>10</sup>	Neighbourhood Plan DA6 Area total
Residential	525 units min (CP I) 500 units (CP II)	564 built to rent 260 community care units	633 units, Mixed tenure of which 188 approved – Hove Gardens 216 build to rent	148 at Peugeot site (KAP site) 67 at Post Office sorting site (Hove Sorting Office)	1,381–1,431 + in addition, 250–265 specialist care community homes, 995 residential units + 260 specialist care community homes
Employment uses North of Railway	Retention / replacement of existing plus 1,000m <sup>2</sup> employment floorspace	5,000m <sup>2</sup> (50% major office, 50% mixed smaller units) 5,164m <sup>2</sup> office space		1,100 954m <sup>2</sup> major office space Peugeot showroom site (KAP site)	8000m <sup>2</sup> + 6,118m <sup>2</sup>
Employment uses South of Railway	Retention/replacement of 12,000m <sup>2</sup> employment floorspace	700m <sup>2</sup> flexible retail (A1 and/or A3) 950m <sup>2</sup> community & leisure	11,500m <sup>2</sup> B1 (office) 8,200m <sup>2</sup> B1c / B8 4,100m <sup>2</sup> flexible other uses at ground floor level (small offices, cultural, retail, cafes, restaurants etc.) 1,662m <sup>2</sup> office space	1,000m <sup>2</sup> (est.) +	29,800m <sup>2</sup> (incl. flexible uses) 1,662m <sup>2</sup> + 611
Cultural		Cultural uses m <sup>2</sup> to be 946m <sup>2</sup> health & well-being centre	Potential flexible use (above) 341m <sup>2</sup> flexible commercial & community floor space		
Retail	5,080 m <sup>2</sup> , Sackville Estate	Retail uses m <sup>2</sup> to be 672m <sup>2</sup> retail/ café space	Potential flexible use (above)		

Commented [RD4]: Table updated to October 2023

<sup>6</sup> Current Existing employment floorspace within : Conway Street Industrial Area is detailed as 18,700m<sup>2</sup> (200,000 sq. ft) in the Employment Land Study 2006; Newtown Road Industrial Area is detailed as 16,000 m<sup>2</sup> (171,000 sq. ft) in the Employment Land Study 2006; Sackville Trading Estate is indicated to be 5,080m<sup>2</sup> B uses and 5,080m<sup>2</sup> restricted A1 retail within the planning report for BH2009/00761

<sup>7</sup> Figures from Moda approved application, March 2020

<sup>8</sup> Figures from Matsim, Power Point presentation May 2016 note these figures include phases 1-7, where the Hove Gardens proposal (1-3 Ellen Street) was phase 1. Watkin Jones approved application, October 2020.

<sup>9</sup> KAP Ltd approved application, September 2020. Excludes any potential redevelopment of Clarke's Bakery site (part of Newtown Road industrial area); excludes New Wave development in Goldstone Lane (5 flats, 6 houses, 119m<sup>2</sup> B1 use); The figures for Goldstone Retail Park are not included in the total as unlikely to be implemented during the plan period.

10 Hove Sorting Office, 88 Denmark Villas – Site allocated for 67 residential units (indicative) + possible employment uses in City Plan Part 2, Policy H1.

<sup>1011</sup> Employment Floorspace figures in the City Plan Policy DA6 include relates to B1-B8 floorspace only. Therefore uses such as retail, cafes etc would not count towards the employment requirements, are not included.

[142137](#) The proposals set out in Table 4 show the potential capacity of much of DA6. The cumulative impact will be substantial and will require careful management of environmental and transport impacts. The Neighbourhood Plan seeks to manage these impacts through its various policies.

[143138](#) The major applications referred to (especially Hove Gardens and Sackville Trading Estate) have each been subject to Transport Assessments. For the remaining sites the table indicates the extent of potential development subject of course to Transport Assessments.

[144139](#) A guidance of the relationship between floorspace and employment density has been provided by HCA/OffPAT guidance on employment densities published in 2010. This guidance takes account of recent trends in terms of the changing use of employment space, the main change being the more efficient utilisation of office space due to increased flexible working and hot desking. This has resulted in a decrease in the amount of floorspace per office worker that is assumed compared to earlier guidance.<sup>11</sup>

[145140](#) The guidance suggests the following ratio:

- offices: 1 job per 10.5 m<sup>2</sup>
- industry: 1 job per 43 m<sup>2</sup>
- warehousing: 1 job per 65 m<sup>2</sup>

[146141](#) In view of the overall need for employment generating opportunities within the city and the need to make best use of land in this central urban area a key consideration will be the total amount of employment that can be generated in DA6. The Forum believes that the ambition of the ~~e~~City ~~p~~Plan can be bettered with a more modern mix of employment opportunities than currently is the case.

[147142](#) There is considerable scope for intensifying land uses in the area with resulting increases in employment and residential units. This applies both to the areas north and south of the railway.

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[December 2020](#)  
[December 2023](#)

[148143](#) It is essential that all new developments respect the framework set for the Hove Station Quarter in the Concept Plan so that the area will function as a whole for the benefit of all concerned.

[149144](#) Whereas it is expected that a number of individual landowners will bring forward development in the DA6 area within the plan period the exact timing and sequence of development is not known. This naturally makes it difficult to exactly plan and provide for the infrastructure needed locally to eventually create a unified Hove Station Quarter. Whilst it is expected that developer contributions will contribute to a number of the proposals for linkages, services and facilities it is expected that such contributions will be insufficient to fund all the investment needed to create the new

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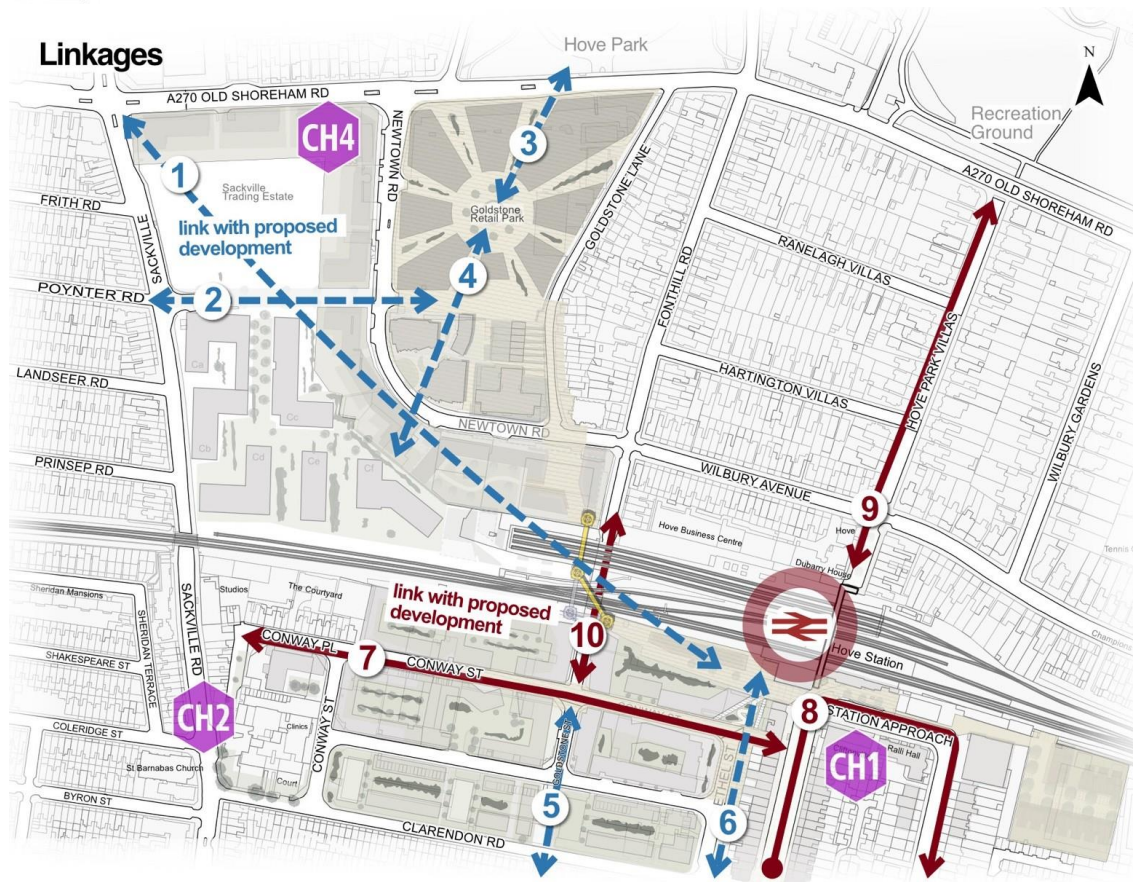
<sup>11</sup> <https://www.gov.uk/government/publications/employment-densities-guide>

quarter. External infrastructure funding will therefore need to be sought to deal with any shortfall or to enable development.

150145 Developer contributions will be a mixture of S106 funds, which in essence deal with on-site requirements or to mitigate the impact of a new development, and CIL contributions for wider infrastructure requirements. CIL funding will be less constrained both in terms of the location where funds are spent and the way they are accumulated. Annex 1 of Part I sets out the detailed improvements required in the area to be funded by a range of sources.

151146 The Forum is concerned to ensure that empty buildings are used as well as possible, while awaiting redevelopment. This might for example mean temporary accommodation for the creative sector or for housing.

Figure 5 - Area wide linkages which need to be respected as part of creating Hove Station Quarter



152147

Hove Station is the centre of the new Hove Station Quarter and should be easily accessible from all parts of the surrounding area.

**Blue arrows indicate desired improved connections once the area is fully developed,** linking the Hove Station Quarter to the station:

- (1) A270/Sackville Rd to Station;
- (2) through Sackville Trading Estate;
- (3) Hove Park to the Goldstone Trading Estate once and if developed;
- (4) through the KAP development;
- (5) link Fonthill Rd towards Clarendon Villas;
- (6) Ethel Rd via steps to Hove Station.

**Red arrows indicate existing connections:**

- (7) Station via Conway St, up narrow steps;
- (8) along Goldstone Villas (vehicular and pedestrian),
- (9) across Hove Station Footbridge to Recreation Ground; and
- (10) under the railway bridge at Fonthill Rd.

153148

Policy 16: Policy 13; highlights the importance of ensuring a traffic management scheme for the area is in place before further car-based connections are introduced.

Figure 6 - Unifying design features including structural planting, environmental enhancements and community hubs



154149

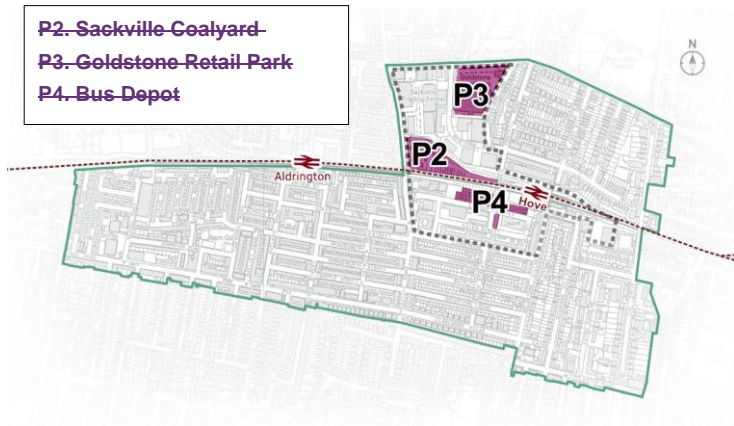
This figure is a diagrammatic representation of the potential for environmental improvements, structural landscaping and attractively designed and safe links across the area. The potential locations for breakout areas or pocket parks and **Community Hubs** neighbourhood facilities are shown.

155150

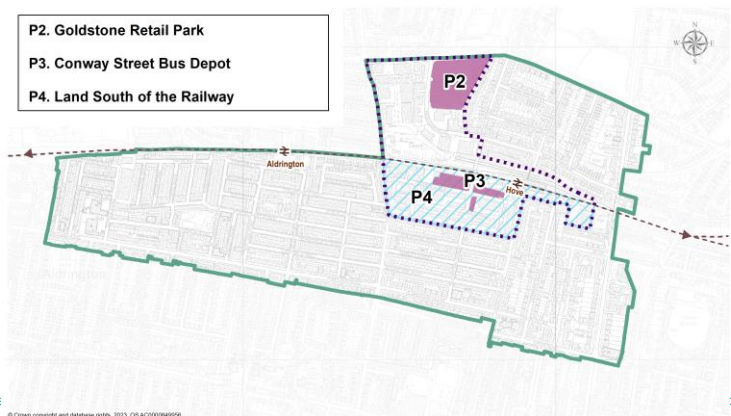
**Relationship to City Plan:** This policy restates the importance of redevelopment in DA6 – but puts stronger emphasis on comprehensive redevelopment, puts a firmer focus on the role of Hove Station as a key part of the emerging new quarter and highlights the local opportunities for intensification of land use.



Figure 7 - DA6 Sites



**Commented [RD5]:** Map updated to reflect NP Examiner's recommended modifications to policies.



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DA6 North of the Railway

**Policy 2: Sackville Coalyard**

The former Sackville Coalyard is allocated for mixed use residential and employment development as part of the wider redevelopment of the DA6 area. See Figure 7, zone P2

156 Reason: Following the Inspector's decision on the Waste and Minerals Site Plan on the 7<sup>th</sup> Nov 2016, the designation for waste management purposes of the Coal Yard Site was removed. (para 89 of the report). This now provides a

SECTION 4

~~major opportunity to include the site for comprehensive redevelopment together with the Sackville trading estate site, both of which are now in one ownership. This will be a significant step towards the implementation of the Hove Station Quarter.~~



~~157 The site has since been included in the emerging City Plan Part 2, as Policy SSA4 (strategic site allocation), which the Forum welcomes. (Relationship to the City Plan: this is a change already supported by the city council).~~



## Policy 32: Goldstone Retail Park

In the event that the Goldstone Retail Park site becomes available for redevelopment, proposals for mixed use residential and employment use will be supported. ~~Any re-development of this site needs to respect the proposed linkages across the site and to other parts of the Hove Station Quarter as set out in PART TWO of the Neighbourhood Plan to help create an integrated quarter. See Figure 7, zone P32.~~

~~158148~~ Reason: This substantial area of land has the potential to make a substantial additional contribution to the City's housing need, whilst retaining or increasing the current amount of employment generated on site. It is thought that this site will come forward after the end of the plan period.

~~158149~~ If the site should come forward earlier within the plan period, redevelopment for a mix of residential and employment uses will be encouraged. The scale and design of development and mix of uses will need to take account of the wider context of major developments elsewhere in the DA6 area. An aspirational layout is shown in PART TWO. (Relationship to City Plan: new policy anticipating redevelopment of this area earlier than the City Plan)

### DA6 South of the Railway

~~160150~~ There are several major landowners to the south of the railway. The planning permission (BH2016/02663) already granted for the recent Hove Gardens development will provide a reference point and context for other emerging and potential future development proposals in this area.

~~164151~~ The ~~proposed~~ Hove Station Area ~~Master plan/SPD will provide~~ provides a range of guidance to ensure that development within the area combines to form a coherent and sustainable neighbourhood, with a pedestrian-focussed public realm that integrates with the locality.

~~162152~~ The ~~Master Plan will provide Hove Station Area SPD for the range~~ supports the delivery of the strategic objectives required by Policy DA6 of the City Plan as well as the policies in this Neighbourhood Plan, including Policies 43 and 54 below. ~~As well as addressing development targets, the masterplan will advise on block forms and building heights. It will provide a blueprint for a pedestrian focussed public realm with improved linkages to Hove Station and adjoining neighbourhoods. The SPD provides detailed guidance to inform future development. It sets out an Area wide strategy: providing principles for the area to the south of the railway with regard to public realm, design and land use, and identifies Site specific opportunities: providing principles for the design of key sites, buildings, streets and spaces within the overall area.~~

## Policy 43: Conway Street Bus Depot



Proposals for redevelopment and/or rationalisation of the current bus depot to provide or incorporate residential and employment uses will be supported as part of a comprehensive redevelopment of the area of DA6 South of the railway.

~~Development of the site would need to take into consideration the need for an improved linkage to Hove Station and would need to be essentially car free as set out in policy 16. Re-development proposals for the site which provide improved access to Hove Station and which would be essentially car free, will be supported. The Hove Station Area Master Plan / SPD will provide the means to ensure that the strategic operational and development needs of the bus company are provided for. See Figure 7, zone P43.~~

~~463153 Reason: Following discussions with the Brighton & Hove Bus and Coach Company, proposals have emerged that indicate opportunities for development which include modernisation of the bus station depot and associated uses. Development could include a multi-storey mixed residential and employment uses above a new bus depot. Development of the site will need to have regard to development proposals elsewhere in the Hove Station Master Plan area, including the Hove Gardens site opposite. In order to limit the transport implication arising from development on the site and reflecting the immediate proximity of the railway station the development should be essentially car free as defined in policy 16. proposals will be encouraged which provide improved access to the Station and are essentially car free. (Relationship to City Plan: this is a local issue not covered in the City Plan).~~

## Policy 54: Remaining Land South of the Railway

Comprehensive redevelopment of land south of the Railway will be supported, taking account of guidance provided in the emerging adopted Hove Station Area Masterplan/SPD. Development should be mixed use residential and employment and should have regard to existing and emerging development proposals elsewhere within the Master Plan SPD area. Any further development in this area over and above permissions already granted should severely limit the provision of car parking, with new residential in the area being essentially car free as set out in Policy 16 (p. 78).

Particular attention should be paid to Industrial House and other Council owned land in the area with a focus on the potential for publicly owned assets to increase the quantum of high quality sustainable social housing and community space.

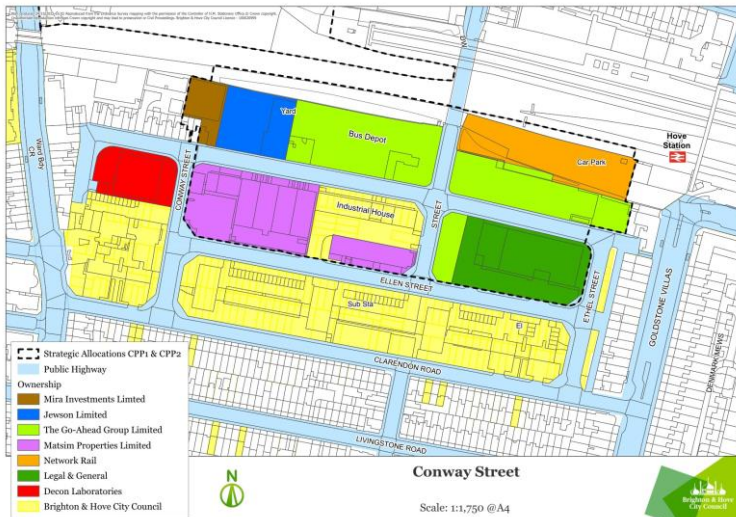
Proposals for enhancing and intensifying the use of land on the Clarendon Ellen estate will be supported. See Figure 7, zone P4.

164154 Reason: From initial discussions with land owners to the south of the railway (Figure 8 - Land Owners), including the City Council, it is obvious that there would be considerable advantages in phased, comprehensive, rather than piecemeal redevelopment of various land holdings south of the railway. A significant proportion of the land and property is in public ownership which offers particular opportunities to increase the quantum of high quality, sustainable social housing and community space. A first indication of such an approach was shown in the information accompanying the Hove Gardens planning application (1-3 Ellen Street), which indicated how adjoining land holdings both by the applicant, the Council and the Hove Bus and Coach Company could be redeveloped in a phased manner. The Concept Plan set out in PART TWO provides an initial framework for and the adopted Hove Station Master Plan /Area SPD which will provides further detailed guidance for development in the area.

Figure 8 - Land Owners



Commented [RD6]: Map updated to reflect changes to land ownership



## 4.1 Housing

**465155** This section sets out the physical requirements of new developments in the area to achieve a high-quality living environment. This includes a framework for housing mix, tenure and affordable housing.

### Policy 65: Housing Mix and Tenure



Throughout the Neighbourhood Plan Area residential development should **Proposals for residential development in the neighbourhood area which** comply with relevant policies for residential development in City Plan Part 1, including Policies CP14, CP19 and CP20 **will be supported**. A mix of rented accommodation, both social and private, and accommodation for owner occupation will be sought across the DA6 area. Bearing in mind the large land holdings in **Within** the DA6 area **developers will also be expected to proposals incorporating residential development which** provide a mix of dwelling sizes that contribute towards meeting city-wide need **will be supported**.

**466156** Reason: The new Hove Station Quarter will be expected to be a lively and socially- mixed area providing a wide range of high-density accommodation ranging from single occupancy to family housing.

**467157** All flats and houses will be required to have access to usable private outdoor amenity space including balconies and terraces. Innovative solutions such as high- level green space will be sought to generate an overall 'green' appearance of the Hove Station Quarter.

**468158** Access to open space is nowhere more important than in high density developments. This is essential for the health of occupants and the overall

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attraction of the area to future occupants. The approved Hove Gardens scheme for 1-3 Ellen Street demonstrates how a high-density complex of mixed use could still provide access to small gardens and green space to residents far above street level.



~~169~~159 Relationship to the City Plan: this policy largely reflects the City Plan policy on Housing mix, Policy CP19, page 214 but introduces an expectation in terms of private and social rented accommodation. Policy DM1 in the ~~emerging~~ City Plan Part 2 ~~will~~ also covers this area.

4.1.1 **Affordable Housing**

~~170~~160 The City Plan deals extensively with the issue of affordable housing in Policy CP20, page 219. This seeks 40% affordable housing on sites of 15 or more dwellings and lower percentages and/or off-site financial contributions for developments of 5 or more dwellings. It also sets out the potential mix for affordable housing across the city to be: *30% one-bedroom units; 45% two-bedroom units and 25% 3+ bedroom units.*

~~171~~161 Regrettably housing pressure in the city coupled with changes in government policy are now such that housing defined as being affordable (typically 80% of market price /rent) is beyond most people locally and more widely in the city that need housing. Equally difficult is the insecurity of tenure which accompanies many rental



agreements with annual increases. This provides a most unsatisfactory mix of high prices and uncertainty. This is highly undesirable in particularly bearing in mind the comparatively low wages which many key workers in the city can command. HSNF therefore fully supports the efforts of the Council and a number of local developers to encourage durable and affordable housing for rent.

<sup>172</sup><sup>162</sup> Within the neighbourhood area, the priority must be to deliver genuinely affordable housing where housing costs are related to mean income and/or eligibility for housing benefits, rather than the current national definition of affordable housing with costs up to 80% of market value. It is also important to ensure that such housing remains affordable over the long term. One effective model for delivering genuinely affordable housing for local people is community led housing. There are numerous examples of this happening elsewhere.

<sup>173</sup><sup>163</sup> ~~The CPP2 Proposed Submission includes Policy DM6 in the City Plan Part 2~~ provides a detailed policy on Build To Rent which ~~will seeks~~ up to 20% affordable housing at genuinely affordable rents to be agreed with the Council.

## Policy ~~76~~: Affordable Housing



Development of affordable housing should comply with Policy CP20 in City Plan Part One. Particular support and encouragement will be given to proposals which deliver genuinely affordable homes (i.e. with rents set no higher than the Local Housing Allowance (LHA) Housing Benefit limit) and which include provision to ensure that the housing remains affordable in perpetuity. There is potential for Council-owned land to contribute towards this as part of the comprehensive redevelopment of the land south of the railway.

<sup>174</sup><sup>164</sup> Reason: Current definition of affordability and rental markets do exclude many people in the city that need housing. It is therefore essential that new models are developed especially in the rental sector. The Forum is aware that new models for the direct provision of genuinely affordable homes are being developed by a range of local authorities<sup>12</sup> Recent change to Government policy has involved lifting the restriction on local authority borrowing to fund development for affordable housing.

<sup>175</sup><sup>165</sup> The Plan supports the recent innovative City Council programmes for the delivery of genuinely affordable homes for rent and the Brighton and Hove Community Land Trust support for community led housing. It also encourages the Council, in partnership with landowners and developers, to further develop these models to ensure that such homes remain affordable for their lifetime, rather than a limited number of years. This may require partnership with Registered Housing Providers.

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<sup>12</sup> <http://rtpi.org.uk/media/2619006/Local-authority-direct-provision-of-housing.pdf>



~~176~~<sup>166</sup> It is likely that the Hove Station Quarter will provide at least 1,150-1,330 new dwellings. Size and tenure will largely be influenced by the market as well as the requirements of the City Plan, which includes an affordable homes requirement. Regrettably housing defined as affordable as defined by the government is beyond the means of many people living and working in the city.

~~177~~<sup>167</sup> In view of the City Council's ambitions to deliver truly affordable housing, the Plan presumes that the Council will join with local developers to facilitate comprehensive redevelopment south of the railway and that the Council's land holding there will provide the key to facilitate truly affordable housing in the area.

~~178~~<sup>168</sup> The Hove Station Area ~~Masterplan/~~SPD ~~will~~ provides a framework for bringing forward redevelopment south of the railway and will give a high priority for the provision of genuinely affordable housing.

~~179~~<sup>169</sup> (Relationship to City Plan: this provides local detailing of the city plan policy CP20, page 219 and seeks to achieve the provision of genuinely affordable homes in Hove Station Quarter.)

## ~~Policy 8: Housing for the Elderly~~

~~Developers will be encouraged to include High Quality Housing Schemes for the Elderly in accordance with identified needs as indicated in emerging policy DM4 in draft City Plan Part 2. For all such schemes Building Regulation M4(2) will need to apply.~~

~~180~~<sup>170</sup> Reason: Within and surrounding DA6 there are many large homes occupied by older residents. Providing a range of high quality housing/accommodation and associated facilities that will encourage and facilitate 'downsizing'/'rightsizing' could allow for better use of the existing housing stock and free up housing for young families.

## 4.2 Employment

### Policy-97: Employment



~~All development proposals for employment purposes should accord with the local priorities and requirements set out in Policy DA6 of the City Plan Part 1. All development proposals within the Hove Station Quarter that are for employment purposes or involve employment provision should accord with the local priorities and requirements set out in Policy DA6 of the City Plan Part 1.~~

Proposals for new retail floorspace within the neighbourhood area should generally be restricted to existing shopping centres defined in the City Plan to help reinforce and strengthen these. ~~However, w~~Within the DA6 area small-scale retail uses may be appropriate as an ancillary element of large, mixed use residential and office developments where it is considered that facilities would help support these developments and would not adversely impact existing defined shopping centres.

Cultural facilities including arts and crafts studios and workshops will be encouraged, especially in the northern part of the DA6 area

New development and changes of uses likely to result in an unacceptable level of

~~4#170~~ Reason: The City Plan sets out a clear shopping hierarchy which this plan reflects. New retail uses should reinforce and strengthen the defined shopping areas within the Neighbourhood Plan area which include: Portland Road (defined Local Centre in [City Plan Part 1 Policy CP4](#)), Goldstone Villas, Hove Park Villas and Old Shoreham Rd/ Sackville Rd (defined as Important Local Parades in the ~~emerging~~ City Plan Part 2 Policy DM13). However, for the major developments expected especially to the north of the railway additional local retail and ancillary uses might be needed to service the new neighbourhood.

~~4#2171~~ There is great demand for cultural facilities as set out in the City Plan and this policy aims to ensure that existing facilities are replaced with more modern facilities as the DA6 area is gradually redeveloped. Such cultural facilities are seen as a necessary key ingredient in the emerging Hove Station Quarter. Opportunities to provide space for arts and crafts studios and workshops will be supported, either as stand-alone schemes or as part of larger mixed-use developments, including through the temporary use of vacant buildings. All such proposals will need to take account of the needs of the artistic community with particular attention to the affordability of rents. This reflects ~~paragraph 8283~~ of the NPPF.

~~4#3172~~ With the expected higher densities and intensive land use it will be important to carefully control additional noise emissions especially from sources such as delivery traffic. This will become an important issue in making Hove Station Quarter a success. It will be essential that times for noisy industrial activities are clearly defined. For example, the replacement of containers of waste should not take place before 8am on weekdays and be prohibited on Sundays. Controls of noisy activities will be sought through planning conditions linked

to the grant of planning permissions. The World Health Organization's Environmental Noise Guidelines



shows strong evidence that noise pollution is a top environmental hazard to both physical and mental health and it is therefore essential to control it as far as possible.

~~404173~~ (Relationship to City Plan: reaffirms the City Plan approach to major new shopping in the City.)

### 4.3 Design and Public Realm

~~405174~~ This section deals with a range of aspects of new developments including heights, access, street level design and landscaping. ~~(see next page).~~

## Policy 108: Design and Public Realm



Designs ~~proposals~~ should make good use of land and create high quality, well landscaped spaces including ~~as appropriate~~ public art. Strong emphasis should also be placed on the design of the street environment to achieve a high-quality public realm, ~~capable of being used in a variety of ways~~, with a strong emphasis on planting. The design of new schemes should include, or make provision for, significant numbers of trees, including street trees.

1. Development proposals within the DA6 part of the Neighbourhood Plan area should provide opportunities to bring nature into the city by substantially increasing the amount of green space in the area (horizontally and vertically).

2. ~~Developers should seek opportunities to~~ Proposals which create new pedestrian and cycle links as green corridors through the area, ~~including linking up~~ connecting pocket parks and other open space will be supported. Where possible, opportunities should also be provided for local food growing and physical activity.

3. Where practicable, ~~developments will be required to~~ proposals which incorporate onsite green infrastructure, landscaping and tree planting (including street trees) as an integrated part of the overall design will be supported. Planting needs to be planned from the outset of a design to ensure sufficient space is allocated to trees. As an alternative to street tree planting developers may provide equivalent vertical or horizontal greening up solutions\*. Developers will be expected to provide a plan for the maintenance of such greening up and tree planting which would be appropriately funded from S106 contributions.

In addition, developer contributions to the Community Infrastructure Levy (CIL) will be used to fund off-site tree planting, including street trees. Within the Hove Station Quarter (DA6 area), the plan sets an objective to plant 1 street tree per residential dwelling or 1 per 100m<sup>2</sup> of non-residential floor space.

4. Where larger developments are proposed, designs which demonstrate that priority ~~should be has been~~ given for architectural solutions to break up the bulk and add visual interest ~~to developments to such developments will be supported~~.

5. Larger residential development proposals should include plans for public landscaped areas to provide for play and breakout both north and south of the railway. This provision should take the form of pocket parks ~~in associated with~~ the Community Hubs at each end of Conway Street as well as in the Sackville Trading Estate area on redevelopment. Potential locations are indicated ~~on p.48, in Figure 6~~ in this document and in the Hove Station Area SPD. These locations will be subject to the recommendations of the Hove Station Master Plan work.

6. All residential proposals will be expected to have regard to the need to provide private amenity space, landscaping and communal areas to enable informal play/social interaction. ~~(In addition, developments of 10 or more residential units will be required to provide/ contribute to all forms of open space and indoor sport provision in line with the criteria and local standards set out in the City Plan and accompanying guidance).~~

7. Taller development needs to ensure a high level of amenity and visual and environmental interest at street level to help contribute to the vibrancy and overall attractiveness of the Hove Station Quarter.

8. Development should 'front' the street, in order to create active frontages, greater natural surveillance and enhanced safety. In the DA6 area, ~~the provision of greater permeability proposals which provide for enhanced permeability through the creation of new routes should allow for this to happen. Buildings which 'back onto' the street will not generally be supported will be supported.~~

\* One example is a green wall, which is a building facade or other internal or external wall intentionally covered with vegetation for aesthetic or functional purposes.

~~406175~~ Reason: ~~¶~~The area provides many opportunities for a more efficient use of land at higher densities. However, this will only provide a good living and working environment if there is high quality design with careful attention paid to landscaping, both vertically and horizontally. It will also be critical to ensure that the public realm to be created is attractive and accessible and can be used by all in a variety of ways.

~~407176~~ When Hove expanded from the 1830s onwards a good quality streetscape including street tree planting was seen as an essential part of a residential area. This tradition of street tree planting, which is one of the defining features of many of the streets in Hove, will need to be retained in the new Hove Station Quarter.

~~470177~~ Several studies commissioned by the City Council set out general detailed guidance on design including the [BHCC Public Space Public Life Study](#)<sup>13</sup> and the associated [2010 Streetscape Design Guidelines](#) street trees and planting (pages 26-29)<sup>14</sup> and developers are expected to familiarise themselves with this guidance. Part Two of this Plan gives examples of some typical design elements, which would be welcome in this area.

~~400178~~ Due to the large land holdings by a few landowners in the area large-scale proposals are likely to come forward for development. This policy aims to encourage a variety in design with different materials and detailing within an overall design framework. There are many examples where such variety avoids monotony and helps create a vibrant area.

~~409179~~ It will be necessary to provide for play and breakout areas throughout the Hove Station Quarter in view of the high densities anticipated in the area. Well landscaped smaller areas will provide much needed relief in the future urban structure. Such areas could integrate play equipment, seating areas and water features as part of a well-designed streetscape. The routes to and from these areas will need to enable the safe and independent movement of families and children as part of their design. An indication where such areas should be located is shown ~~on p.48, in~~ Figure 6.

<sup>13</sup> [brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/public-life-public-space](https://brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/public-life-public-space)

<sup>14</sup> [brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/transport/Streetscape\\_Design\\_Guidelines.pdf](https://brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/transport/Streetscape_Design_Guidelines.pdf)



It is expected that these landscaped areas will be provided as part of new developments and their internal landscaping and will be funded by S106 contributions.

~~190~~180 The experience of developments at street level to users and passers-by is most important and at least as critical to the success of a development as the overall physical structure. A variety of facilities of interest together with attractive landscaping including break out areas will help make the immediate environment of the new developments much more attractive.

~~191~~181 In the wholesale redevelopment that is anticipated to create Hove Station Quarter it will be essential to design the area and the various links in a way that guarantees the safety of movement of all local residents and workers in particular to Hove Station, Hove Park, Central Hove and the Seafront.

~~192~~182 Area DA6 is currently nearly devoid of greenery. It will be critical for the future quality of living and working in the area that as part of redevelopment substantial planting takes place in the area in particular street trees to help manage microclimate, absorb fumes and soften the built environment. Street Trees need to be planted with sufficient space and in tree pits that eliminate as far as possible future damage to highways and pavements. Typical details are shown in PART TWO.

~~193~~183 Whereas there are no designated wildlife sites in the Neighbourhood Plan Area, ~~policy 10~~ Policy 8 seeks to substantially strengthen the amount of green space (horizontally and vertically) and create a number of pedestrian and cycle links that can also be planted up and that will eventually create corridors with interspersed pocket parks, These can deliver multiple benefits efficiently and have important benefits for healthy lifestyles and community development.<sup>15</sup>

~~194~~184 For the area to be functioning as a good quality quarter it is essential that adverse environmental impacts are managed and are kept to a minimum. Trees contribute to wide range of benefits including improved local air quality and good local climate providing shade and comfort. Final street tree locations will need to be carefully researched given existing underground utilities.

~~195~~185 In the wider Neighbourhood Plan Area substantial improvements to the public realm are needed for example along Portland Road and along Goldstone ~~v~~Villas including improved planting and seating.

~~196~~186 (Relationship to City Plan: This reflects ~~p~~Policy CP13, page 192 of the City Plan and Policy CP12, page 188 which deals with urban design, but at a more general level than this policy. Street tree planting relates to CP13, bullet point 6, page 193. Variety of design relates to policy CP12, page 188. The reference to smaller landscaped areas reflects policy CP16, p 199. No larger public open space is suggested in the area bearing in mind the proximity of Hove Park and Hove Recreation Ground. The policy also reflects the sentiments of the City Plan chapter on An Attractive City, 187 ff)

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<sup>15</sup> This reflects the approach in Brighton and Hove Council (2009) Green Infrastructure Network Study [online] available at: <http://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one-background-studies>

## 4.4 Tall buildings

<sup>197</sup>~~187~~ The Brighton and Hove Tall Buildings Study of 2003<sup>16</sup> stated that Hove Station, although not as well serviced as Brighton Station is still of citywide transport significance and is also integrated with major bus routes. The areas surrounding the station are also less constrained by conservation issues with a number of industrial sites to the west and several existing tall residential blocks immediately to the south west. Thus, the report suggested~~s~~ that the combination of existing tall buildings, transport links, and limited conservation constraints makes the Hove Station node one of the best opportunities for intensification through tall buildings in the city<sup>17</sup>. The report concluded~~s~~ with a vision of the Hove Station area as follows:

<sup>198</sup>~~188~~ “The approach sequence from Hove Station to the seafront is characterised by an unfolding view experience around the station and along tree lined streets of primarily residential terraces. High quality tall development around the station itself would potentially significantly enhance the public realm and create an enhanced arrival experience to the area. More intense development would also increase the levels of activity and vibrancy of the station area. Large council tower blocks surround parts of the station but are separated and dominate the skyline. There is significant potential to create a more unified skyline by filling in some gaps and utilising a more clustered approach to tall development, especially in the adjacent industrial estate.”<sup>18</sup>

<sup>199</sup>~~189~~ Following the study the Council adopted a~~s~~ supplementary planning guidance on tall buildings (SPG15), where the area adjacent to Hove Station was identified as a node for taller developments (i.e. 8-15 storeys).<sup>19</sup> The City Plan picks up this theme and indicates that Hove Station area is one of those areas where buildings higher than 6 storeys can be considered although they need to meet the criteria set out in the SPG<sup>20</sup>. SPG15 has since been superseded by the Urban Design Framework (SPD17) adopted by the Council in July 2021, which provides updated guidance on tall buildings in the Hove Station area. Further guidance is also provided in the Hove Station Area SPD (SPD18).

<sup>200</sup>~~190~~ In view of the potential for taller buildings in the area the Forum believes it is essential that the cumulative impact of such buildings create an interesting and appealing townscape as an arrival destination. The current vista of the 10 storey council blocks in Clarendon Road from say Hove Park provides a sharp contrast to that vision and is monotonous and unattractive.

<sup>201</sup>~~191~~ There are several concerns about building heights that need to be addressed including how they fit in to the surrounding low-rise mainly Victorian buildings and structures and how any large buildings can work together to create an attractive vista. Heights to the north of the railway line need generally to be lower than from those to the south. To the South of the Railway a precedent for high buildings has been set by the 10 storey residential blocks of Clarendon Road Estate as well as the

<sup>16</sup> Gillespie Brighton and Hove Tall buildings study 2003; [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/tdf/Tall\\_Buildings\\_Study\\_Final.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/tdf/Tall_Buildings_Study_Final.pdf)

<sup>17</sup> Paras 14.4.2, 14.9.3, 15.6.4 all emphasize the same message

<sup>18</sup> Page 101 of the same report

<sup>19</sup> [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/localplan2001/15\\_SPGBHTall\\_buildings.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/localplan2001/15_SPGBHTall_buildings.pdf), para 5.2 provides a definition of taller buildings, while section 8 defines the nodes for taller buildings

<sup>20</sup> City Plan Part 1, policy CP12, para 4.146

~~1718~~-storey tower in the ~~approved Matsim~~ Hove Gardens ~~development~~. City policy accepts that building heights of 8-15 storeys might be acceptable in the central parts of this area. This reflects the fact that the lie of the land is such that considerable heights are acceptable without adversely affecting surrounding areas. It will be critical to shape proposals in such a way that the higher buildings together generate an attractive silhouette and that higher buildings are therefore clustered.

## Policy ~~119~~: Tall buildings



Building heights in DA6 will be consistent with the Neighbourhood Plan vision of a high-density station quarter of an urban character ~~and should comply compliant~~ with City Plan Policy CP12, the accompanying Urban Design Framework SPD and Hove Station Area Masterplan. New tall buildings should have regard to and respect existing buildings and planning permissions already granted, taking account in particular of the key views illustrated in [Figure 9](#) and from the Hove Station Conservation Area.

To the north of the railway taller buildings may be acceptable in locations that allow them to act as Hove Station Quarter landmarks and aid way finding.

Any redevelopment of the Goldstone Retail Park might include a higher building at the north eastern corner as long as there is visual permeability of the site when viewed from Hove Park.

To the south of the railway, development should take advantage of the lower topography by bringing forward taller buildings at occasional points within the area, as long as they are designed in such a way as to collectively minimise overshadowing and enable for good visual permeability north-south.

In the [neighbourhood](#) area outside DA6 new developments are expected to reflect the prevailing heights of surrounding buildings.

<sup>202192</sup> Reason: The Hove Station area has long been identified as one of the best nodes in the city for intensification through tall buildings. The Forum believes that this challenge should be welcomed as an opportunity to create an exciting new high-rise townscape. The Forum does accept that the ~~tests of~~ [SPG 15 design priorities in the SPD17 Urban Design Framework](#) need to be applied, however this should not be used as a carte blanche to resist high buildings per se. The Forum was gratified to note that the high buildings proposal of the ~~approved~~ Hove Gardens scheme (1-3 Ellen Street), which includes a peak at ~~1718~~ storeys, was well supported by the local community,

by Hove Civic Society, Regency Society and the Hove Station Neighbourhood Forum, which demonstrates that high building, provided they are well designed, can carry substantial local support.

~~2021~~<sup>193</sup> [Figure 9 below](#) shows the impact of the Sackville Trading Estate (MODA), Hove Gardens (1-3 Ellen Street – [Matsim proposal allowed on appeal in 2019 but since superseded by the Watkin Jones development, now owned by Legal & General](#)) and KAP (Newtown Road) planning permissions from the north (top of Hove Park) and from the east (centre Goldstone Villas). These ~~already~~ permitted developments provide an indicative frame for high buildings in the area.

Any additional high buildings should be contained within that frame and should together provide a cohesive town and roofscape.

~~204194~~ The Hove Station ~~Master Plan /Area SPD~~ ~~will~~ provides further details on massing and height to the south of the railway.

**Sackville Trading Estate redevelopment by MODA, approved March 2020, max 15 storeys**

Figure 9 - Key views of MODA from Hove Park



**Hove Gardens, 1-3 Ellen Street,**

Matsim proposal approved on appeal 2019, max 17 storeys (since superseded by the Watkin Jones development, now owned by Legal & General)

*Figure 10 - Hove Gardens viewed from Goldstone Villas*



**KAP Proposal, Newtown Road,**

approved 22 March 2020, max. 10 storeys



205195 Outside the DA6 area the neighbourhood is primarily made up of mid to late Victorian properties of high density of 2 – 4 storey height and new developments need to conform to those heights in order to retain the integrity of the local townscape.

~~206~~<sup>196</sup> (Relationship to the City Plan: Policy CP12, page 188, sets out general expectations on heights of buildings. Hove Station area is one of those areas where buildings higher than 6 storeys (18m) are acceptable).

## 4.5 Community Facilities and Community Hubs

~~207~~<sup>197</sup> The City Plan in its infrastructure section sets out developments needed in the city to deal with needs such as schools, open spaces and a range of infrastructure requirements arising from anticipated developments up to 2030. For DA6 there are a few special requirements expected based on the anticipated level of the development as set out in the City Plan. The Infrastructure Delivery Plan (dated June 2017), which is an Annex to the City Plan lists the following:

- District Heating / Combined Heat and Power (CHP technologies) linked to new developments (highlighted as 'important'), (page 11);
- Community composting for all development areas, (page 22);
- Increase in school places provision and educational floorspace (highlighted as 'essential'), with additional classroom needs at four Hove / Portslade schools emphasized (Page 24ff);
- Local Employment and training places through local employment agreements in partnership with Brighton & Hove Local Employment Scheme (BHLES), (Page 31);
- Enhanced public realm and measure for upgrading with improved access to include: walking/cycling links, green public realm and townscape, pedestrian routes and links between areas. Design standards and delivery as set out in The Public Space, Public Life vision and the Streetscape Design Guidelines, (Page 35 ff);
- Appropriate safe and sustainable transport infrastructure including public realm, pedestrian improvements and/or renewal and ongoing maintenance of appropriate lighting infrastructure to serve all new developments, (Page 37).

### 4.5.1 Need for School

~~208~~<sup>198</sup> During our community engagement there was a considerable debate about the need for allocation of land within the area for a new school in particular. Whilst there is a good overall match between population and the provision of school places across the City, specific pressures are felt in BN3, 4 and 5 areas (broadly speaking the area of Hove ~~below~~ south of the railway line).

~~209~~<sup>199</sup> The Local Authority has dealt with that pressure to a degree by expanding local schools not least the expansion of St Andrews CE Primary School.

~~210~~<sup>200</sup> Whether the current pressure will continue or whether we have reached a peak in demand is impossible to say at the present time.



[214201](#) The City does not include any specific additional education provision to serve the min additional 525 residential units allocated in DA6. However, the Infrastructure Delivery Plan states that education provision will be 'Ongoing throughout life of Plan' with 'Developer contributions dependent upon scale and type of development'.

[214202](#) As set out earlier in this plan we can expect a minimum of some 1,300 new residential units within the plan period. Using the Council's standard calculation based on an average distribution of dwelling types, tenure and number of affordable homes it is suggested that this would result in 200 primary and 170 secondary pupils. As far as primary schools are concerned a 2FE (Form Entry) school is now considered by the EFA as the smallest financially viable unit. This means an intake of 60 pupils per year (420 for the school as a whole). The demand generated by the proposed residential component of the HSNP would therefore be less than half needed for a new school. It is highly unlikely that there will be a doubling of the numbers of new units (i.e. 2,660 units), which might justify a 2FE school. Consequently, there is concern about the suggestion of providing a new school in the area because of the possible impact on existing schools.

[214203](#) If a new school was proposed it would have to be a free school or academy. The academy sponsor would be chosen and approved by the Secretary of State.

[214204](#) The forum has therefore concluded NOT to include a specific designation for a new school in the plan. This means that CIL funds will be used to deal with the educational requirement of new residential units will be directed to other schools in the city to deal appropriately with the impact.

### New school places



A need for school places arising from additional housing will be funded via developer contributions through CIL. Such funds will be directed to necessary improvements at existing schools (NPPF para [9495](#)).

[215205](#) Reason: As population increases in the area in incremental stages, school accommodation will need to be found. The proposed educational needs arising from the anticipated development in the plan area will not justify a new school and funds will therefore need to be directed towards educational investment in other schools in Hove. (Relationship to City Plan – the Infrastructure Delivery Plan, July 2017, lists requirements arising from development anticipated).

## 4.5.2 Other community facilities

[216206](#) However, should there be a demand for school places for a free school or other community facilities such as a doctor's surgery then the forum believes these can be accommodated within the volume of building proposed subject

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to demand and willingness by the market to provide such services.



## Policy ~~12~~10: Community facilities



Proposals which broaden and enhance the mix of community facilities such as day nurseries, GP surgeries or sports facilities will be encouraged as an essential component to the use mix in the Hove Station Quarter.

Such proposals will need to take account of relevant planning policy considerations including traffic/parking and neighbour/amenity impacts. Where proposed developments would lead to increases in local population any consequent pressure on existing provision will be addressed by developer contributions through the use of CIL contributions

217207 Reason: Such facilities will be of great benefit to both existing and future residents and workers in the area and it is expected that the market will provide for a range of them. There are no plans for additional publicly provided facilities.

218208 The term 'community facilities' encompasses a wide range of facilities and services which are set out in national policy as being social, recreational and cultural in nature<sup>21</sup> Those most relevant to the Hove Station Quarter will be educational use (non-residential), health clinics / GP surgeries, day nursery / crèches as well cultural and social facilities including sports facilities.

<sup>21</sup> National Planning Policy Framework – paragraph 92

## Policy ~~13~~11: Community hubs



~~Several Four~~ locations within the plan area, ~~around Hove Station, the western end of Conway Street, the northern end of the Sackville Trading Estate and near Stoneham Park,~~ have been identified as suitable for community hubs in which a range of facilities should be located. ~~The~~ proposed locations are:

- a) ~~Close to Hove Station;~~
- b) ~~At the western end of Conway Street;~~
- c) ~~At the northern end of the Sackville Trading Estate; and~~
- d) ~~Close to Stoneham Park;~~

~~as indicated in Figure 6, p.48~~ in Part ONE of this plan. It is expected that development will direct appropriate uses to these areas. ~~Appropriate community uses and CH-funding will be directed to these locations to help enhance these hubs.~~

Additional retail activities ~~will also be acceptable as long as they are associated with the provision of the community hubs~~ located within ~~nearby~~ defined local shopping centres/defined important local parades ~~will be supported~~. These areas are also prime candidates for an improved public realm.

~~249209~~ The community hubs identified are as follows:

- CH1 - Hove Station Hub** – the commercial area immediately to the north, south and east of the station – the main hub of the proposed Hove Station Quarter. This links with Goldstone Villas (Important Local Parade) and with Hove Park Villas (Important Local Parade);
- CH2 - Sackville Rd – Conway St Hub** – including the Salvation Army building, the Vallance Community Centre, the Honeycroft community facilities, Stockwell Studios and the Decon factory;
- CH3 - Stoneham Hub** – including the school, the new health centre and the Westows site (~~to be now~~ redeveloped for housing), commercial uses on Portland Road, together with Stoneham Park with its community café. This links with Portland Road Local Centre;
- CH4** - A further hub will be included in the redevelopment of the Sackville Trading Estate. This links with Old Shoreham Road / Sackville Road Important Local Parade.

~~220210~~ Reason: As developments progress in the Hove Station Quarter, facilities available to the community will be needed to make the area attractive and liveable. Each hub might be different and respond to local needs and opportunities. For example, the area within the Sackville Trading Estate could focus around new artists workshops; the area around Hove Station might include cycling facilities, an improved transport interchange and improved facilities located in the Old Station building as well as a generally

improved public realm that invites people to stay in the area. PART TWO provides indicative schemes developed by the local community supported by the Forum. The identification of Community Hubs and their improvements follows NPPF paras. 28 and 34.

~~224211~~ Additional requirements are set out in the City ~~p~~Plan, not least that development should explore low and zero carbon decentralised energy opportunities. Connection should be made to Decentralised Energy (Heat) networks where a suitable system is in place (or would be at the time of construction) or design systems so that they are compatible with future connection to a network. All development incorporating heat network infrastructure will be expected to meet the minimum standards specified in the CIBSE Heat Network Code of Practice and demonstrate consideration of future connection to a wider heat network, including;

- a. control systems and temperatures of operation;
- b. routing of pipework and location of the energy centre;
- c. safeguarded access for external pipework into the energy centre; and
- d. space within the energy centre for a future heat substation

~~222212~~ A feasibility study is ~~currently~~ being conducted by Brighton & Hove City Council and all new development should contact the City Council as early as possible in the development planning process in order to maximise the likelihood of a timely connection.

## 4.6 Conservation



**224213** Large parts of the central and eastern part of the Neighbourhood Plan Area are designated conservation areas. Hove Station Conservation Area (1) and Denmark Villas Conservation Area (2) lie entirely within the Neighbourhood Plan Area. Most of the Drive Conservation Area (3) and part of the Willett Estate Conservation Area (4) are also within the area.

**224214 1) Hove Station Conservation Area** focuses on Hove Station and stretches northwards across the railway to include the northern end of the footbridge and the now demolished ticket office. To the south it extends along Goldstone Villas up to Eaton Road, to the east it takes in Station Approach and the upper parts of Denmark Villas. Of the listed buildings within the conservation area, one, the former ticket office in Hove Park Villas is now demolished. The remaining listed buildings are: the two station buildings, ~~and~~ the footbridge across the railway, and Ralli Hall.

*Figure 11 - Hove Station listed grade II; this includes two station buildings and the footbridge across the railway: The original building facing Goldstone Villas in white render was constructed in 1865-6 in the Tuscan villa style.*



225215 2) **Denmark Villas Conservation Area** centres around Denmark Villas and abuts Hove Station Conservation Area in the North and extends to Eaton Road in the South.

*Figure 12 - Holy Trinity Church, listed building in Denmark Villas Conservation Area*



226216 3) **The Willett Estate Conservation Area** is mainly to the east of Neighbourhood Plan area and abuts Denmark Villas and The Drive conservation areas.

*Figure 13 - The Willett Estate Conservation Area*



227217 4) **The Drive Conservation Area** centres around The Drive from Eaton Manor in the north to Eaton Road in the south.

*Figure 14 - The Drive Conservation Area*



## Listed buildings

*Figure 15 - Ralli Memorial Hall, walls and railings grade II; the design is in the 'Wrenaissance' style, with red brick walls laid in English bond, a hipped clay tile roof with upswept eaves and a strongly moulded wooden dentil cornice.*



229218 The Neighbourhood Plan area includes a number of listed buildings are listed, most notable are:

- Hove Station buildings and footbridge
- Ralli Hall
- Holy Trinity Church, Eaton Road;
- 2-36 Cromwell Road including attached railings and walls;
- 3,8 (incl. walls and gates) and 14 (incl. front area garden walls) Eaton Gardens;
- A large number of properties on the west side of The Drive; Church of St Barnabas, Byron Street; the Methodist Church, Portland Road.

229219 Apart from these buildings there are several locally listed or historic buildings and structures in the area. The current register includes: the Station pub (originally Cliftonville Hotel); Europa House, the former Nonconformist chapel, built 1878, Fonthill Road railway bridge, assumed built in 1840, The Dubarry buildings, designed in 1930, 101 Conway Street Flint Cottage, dated 1886, Tennyson Court along Sackville Road, built 1887-88, The Poets Corner, Montgomery Street, built in 1886 and The Drive & Eaton Gardens, built in 1963<sup>22</sup>.

230220 A full description of the Hove Station conservation area can be found in the B&HCC Character Statement for the area approved as supplementary planning guidance in 1997, from which the descriptions of the listed buildings above are copied.<sup>23</sup> Details for the Denmark Villas Conservation area can be found here,<sup>24</sup> details for The Drive

<sup>22</sup> Building details <https://www.brighton-hove.gov.uk/content/planning/heritage/local-list-heritage-assets>

<sup>23</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation\\_Area\\_Hove\\_Station\\_Dec\\_2015.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_Hove_Station_Dec_2015.pdf)

<sup>24</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation\\_Area\\_Denmark\\_Villas\\_Dec\\_2015.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_Denmark_Villas_Dec_2015.pdf)



Conservation area here<sup>25</sup> and details of the Willett Estate Conservation Area here<sup>26</sup>. The character statements for Denmark Villas, The Drive Conservation Area and the Willett Estate Conservation Area were all adopted as supplementary planning guidance in 1997.

<sup>234221</sup> No further work has been carried out by the Council since 1997 for example in producing an enhancement strategy or investment strategy for this conservation area. The small improvements in the Hove Station Conservation Area CA in the Hove Station CA that have taken place, such as the paving and access for the car wash on the grounds of the original station building have instead cemented a most unsatisfactory use to be located within the curtilage of a Grade II listed building.

<sup>232222</sup> It is not expected that there will be many changes along the Denmark Villas part of the Hove Station Conservation Area during the plan period. However, the area comprising the two station buildings and the footbridge are included in the Hove Station Community Hub proposals, which address the lack of enhancement and investment in this area. In particular the area now occupied by the car wash presents a major opportunity for an improvement in the area, to strengthen its attraction as part of the centre of the new Hove Station Quarter. For the longer term the site now occupied by the petrol station could provide a prime development opportunity in a key location which could enhance and strengthen the identity of the new Hove Station Quarter.

<sup>25</sup> [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation\\_Area\\_The\\_Drive\\_Dec\\_2015.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_The_Drive_Dec_2015.pdf)

<sup>26</sup> [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation\\_Area\\_Willett\\_Estate\\_Dec\\_2015.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation_Area_Willett_Estate_Dec_2015.pdf)

## Policy ~~14~~12: Conservation

Proposals for change of use and /or improvements to the original Hove Station building will be expected to contribute to increasing the attraction of this part of the centre of the new Hove Station Quarter and to help improve the public realm and enhance the setting of the station

Developments in the Conway Street area will be expected to contribute to public realm improvements along Conway Street especially those areas abutting the Hove Station conservation area.

When considering visual and other impacts of new development of the Hove Station Quarter on the Hove Station core of the conservation area, it is essential to ensure that new developments do not cause harm to a listed building or the conservation area.

New developments will be expected to contribute towards the conservation and enhancement of historic environment features.

233223 Reason: This part of the Hove Station Area is in particular need of public realm improvements. The Goldstone Villas part of the Hove Station ~~e~~Conservation ~~a~~Area is unlikely to experience any redevelopment of the frontages along Goldstone Villas. However, to the rear of the buildings, facing Conway Street, there are major opportunities for enhancements and improvements, some of which have already taken place. Developments taking place in the Conway Street area such as the approved Hove Gardens development will present an opportunity to act as a catalyst for improvements to the rear of the Hove Station ~~e~~Conservation ~~a~~Area.

234224 The rear of the conservation area at Goldstone Villas facing the Conway Street area is in particular need of public realm improvements, which should be encouraged as part of any comprehensive redevelopment of the Conway Street area.

235225 (Relationship to City Plan: This reflects and develops City Plan Part 1, policy CP15 and City Plan Part 2, policy DM26) The policy is considered to reflect NPPF para-~~193~~199.

## 4.7 Transport and Movement

<sup>226</sup> In the Council's supplementary planning document (~~SPD~~ SPD14 Parking Standards), a zonal approach is developed which ~~provides for~~ defines a 'Central Area' around Brighton Station and central Brighton, with the Hove Station Area being ~~included within the 'Key Public Transport Corridor'~~ zone. The different levels of public transport accessibility across the city in the SPD have been calculated and mapped using Visography TRACC software and an analysis of Census car ownership levels in different areas of the city. Compliance with SPD14 is now a requirement of Policy DM36 in City Plan Part 2 and is set out in full in Appendix 2 of that plan.

<sup>236227</sup> ~~The lower~~ It is considered that reduced car parking requirements ~~are equivalent to those in the 'Central Area'~~ are justified in the DA6 Hove Station Quarter by the virtue of the proximity of all the sites ~~in the Hove Station Quarter~~ to good public transport including rail and buses and the already large proportion of people living in the area not owning a car.

Table 5 – Extract from the SPD 14. (For full details refer to the SPD directly)

Land Use	Parking Standard			
	Parking Type	Central Area	Key Public Transport Corridors	Outer Areas
C3 Dwelling Houses 1 - 2 beds	Car	0.25 spaces per dwelling	0.5 spaces per dwelling plus 1 space per 2 dwellings for visitors	1 space per dwelling plus 1 space per 2 dwellings for visitors
		On-street residents permits restricted in CPZ areas based on consideration of the relevant factors	On-street residents permits restricted in CPZ areas based on consideration of the relevant factors	
	Car Club	Car club bays provided on a case by case basis for major development		
	Electric Vehicle	For schemes of 10 or more car parking spaces 10% of car parking provision to have electric vehicle charging provision 10% of car parking provision to have passive provision to allow conversion at a later date		
	Cycle	Residents - 1 cycle parking space per unit (Long Stay) Visitors from a threshold of 5 units – 1 cycle parking space per 3 units (Short Stay)		
	Disabled User Parking	1 space per wheelchair accessible unit plus 50% of the minimum parking standard for ambulant disabled people & visitors		
	Motorcycle	Major developments based on at least 5% of the maximum total car parking standard. Minor developments provision provided on a case by case basis.		

## Policy 1513: Parking and Movement



Parking provision in new developments in DA6 will need to comply with the standards set out in the Council's Supplementary Planning Document 14 for the Central Zone. Parking in the remaining parts of the Neighbourhood Plan area will need to meet the standards for Key Public Transport Corridors. [\(See Figure 16\)](#)

Subject to public consultation the controlled parking zone in the area will be extended to cover Newtown Road to manage the impact of future car parking in the area.

To maximise the efficient use of land, applications for alternative locations for the existing car park at Hove Station will be supported.

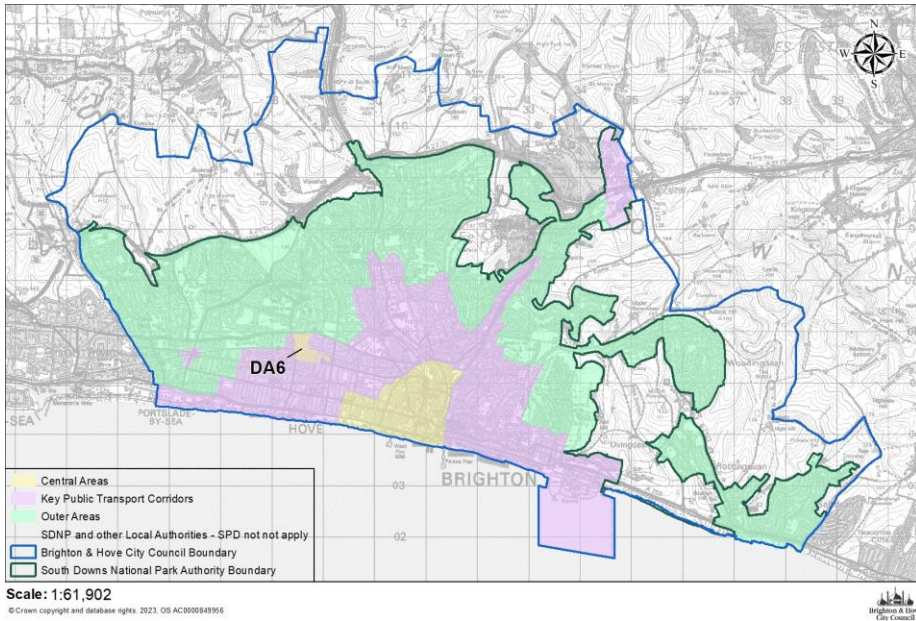
New developments should aim to minimise car-based travel and should actively promote and encourage more sustainable modes of travel such as public transport, cycling and walking. This will require travel plans as well as a range of other measures such as designated car club spaces to be allocated throughout the area in discussion with the city's car clubs, electric charging points, plus extensive and secure cycle parking to standards as set out in SPD 14 [\(see Table 5 above\)](#). In addition, support for additional public transport services may be required.

New developments proposed will need to ensure that the Hove Station Quarter is easily accessible on foot and by cycle by the provision of appropriate routes. It is also essential that developments ensure that motorised traffic can percolate through the area but that measures are taken in developing the area that severely limit the speeds of any through traffic. Policy 1 and the schedule in Annex 1 set out the expectations of developers and proposed mechanisms to facilitate area wide linkages.

Improvements to the local road/highway network will be sought in order to ensure that safe, efficient and sustainable movement is achieved for all road-users. Such improvements will need to mitigate the impact of new developments in the Hove Station Quarter. Roads that are likely to be impacted include [Old Shoreham Road](#), [Fonthill Road](#), [Goldstone Villas](#), [Wilbury Avenue](#) and [Newtown Road](#).

Provision of an east-west pedestrian/cycle link connecting the Sackville Trading Estate / Coalyard site with [Newtown Road](#) will be supported. The feasibility of a vehicular link should also be examined although any such proposal will need to be considered in the context of a comprehensive traffic management scheme for the area in particular to avoid extensive rat-running through the [area-area](#) from [The Drive](#) via [Wilbury Avenue](#) / [Newtown Road](#).

Figure 16 - Updated Parking Zones map showing DA6 area within the Central Area



174228 Reason: Throughout the preparation of this plan and numerous public consultation engagements, the impact of new developments on traffic and parking in surrounding areas has been a recurring theme. Such concerns have expressed themselves repeatedly in objections to individual developments both within DA6 but also in related areas such as Toads Hole Valley. Policy 1613 aims to minimise the impact of new development by a range of measures, most important of which is to reduce the amount of traffic to be generated on site by reducing car trips arising from developments. The proposal to reduce car parking standards will greatly assist this and the development proposals that have arisen in the last few years are already applying car parking standards that are lower than those suggested in Policy 1613. Community engagement during plan preparation has from the outset repeatedly emphasized the importance of minimising the traffic and parking impact of new development in the area.

237229 The ~~changes to reduced~~ parking standards for the DA6 Hove Station Quarter set out in Policy 13 (as shown in Figure 16) and the extension of controlled parking to cover the whole of the DA6 area will require the active support of the City Council as transport and parking authority. These changes should ideally be implemented before the occupation of major developments permitted.

239230 Good access to car parking, without parking dominating the entire area will require skilful design and layout of Hove Station Quarter. A better car parking facility than that at the station itself is desirable to free land in the vicinity of the historic station for more attractive uses. Equally it is desirable that land made available for car parking is also well used and easily accessible during

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weekends and that commuting spaces can be accessed by residents and visitors to the area. One or several central parking facilities woven into the new fabric and connecting to the station for example from the north via the proposed footbridge or rejuvenated bridge across Fonthill Road are desirable. The concept plan set out in Part Two suggests one potential location north of the railway for such a facility. This issue ~~will need to be fully~~ is addressed further in the Hove Station ~~Master Plan / Area~~ SPD.

239231 Managing traffic flows in the area to optimise the use of land and make the area as attractive as possible will require a range of measures. Car club provision should include dedicated bays and vehicles, and only be included where an operator is prepared to provide them. Early dialogue and agreement with car club operators is therefore recommended. At the very least, (discounted) access to car club membership to encourage use of vehicles should be secured. Policy CP9, page 171 of the City Plan, provides the framework for such measures.

240232 One of the greatest challenges in developing the Hove Station Quarter will be to manage the traffic flows in and around the area in such way that effective access is provided whilst not placing excessive pressure on existing residents and businesses. The Forum believes that there are a number of measures that need to accompany the development of the Quarter to ensure that the high-quality environment that is envisaged will materialise. To manage additional traffic, it will be necessary to make the area both north and south of the railway permeable to motorised traffic. This will for example relieve pressure on the Sackville Road / Old Shoreham Road junction and provide better circulation south of the railway. In Part TWO, ~~we set out~~ are set out a number of approaches which will allow movement through the sites whilst controlling the environmental impact of such traffic.

241233 These improvements are essential for containing the potentially negative impacts of new development in the area, to help manage the increased traffic along these roads and to bring up existing infrastructure to a level of quality that will be commensurate with the new development.

[242234](#) (Relationship to City Plan: SPD14 was adopted in October 2016 and will replace a number of detailed policies and these changes should be inserted into Part II of the City Plan. The policy makes some of the requirements of Policy CP9 more specific and seeks to translate the expectations of CP9 to the local area).

## 4.8 Implementation

[243235](#) Creating Hove Station Quarter will provide a unique opportunity to improve the rather run-down environment in many parts of the area. This will connect with the history and origins of Hove Newtown and development of the Cliftonville area in the late 1800s, where high standards of public realm with good quality materials, street furniture and dense street tree planting were seen as essential to attract new residents. The new buildings in Hove Station Quarter should similarly set the tone for a high-quality environment affordable for a wide range of people.

### Policy [1614](#): Developer Contributions



New Development will be expected to contribute to a range of local infrastructure requirements and improvements via Section 106 contributions and Community Infrastructure Levy (CIL), such as school infrastructure, open space and public art. Developer contributions to deal with highway issues are also likely to be required.

[Annex 1](#) sets out a list of improvements required in the area.

[244236](#) To ensure the longevity of improvements such as tree planting the Forum proposes that an environmental endowment fund is set up to support long term maintenance in the neighbourhood area. It is proposed that contributions from the neighbourhood portion of CIL are used to support such a fund. Clearly any such future use of CIL will need to comply with the requirements of the CIL regulations.

[245237](#) Reason: Apart from creating a better environment as an integral part of the new developments it will be important to deal with the anticipated increased environmental pressure in the area, not least through wear and tear, and to introduce high quality improvement measures. The areas which need improvements and where place making will be critical are shown on the Concept Plan. The approach aligns itself with the suggestions made to the Council in 2007 by the Danish architect Jan Gehl in his report Public Life, Public Space<sup>27</sup>. Special attention will need to be paid to improve some of the Victorian structures, such as the undercrofts to the railway bridge (Fonthill Road) and the transition between the new developments and the adjoining conservation area. (Relationship to City Plan: This develops further policy CP13, page 192.)

[246238](#) A list of projects and proposals contained in the Concept Plan in PART TWO that need to be implemented to complete the Hove Station Quarter are set out

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in the Annex



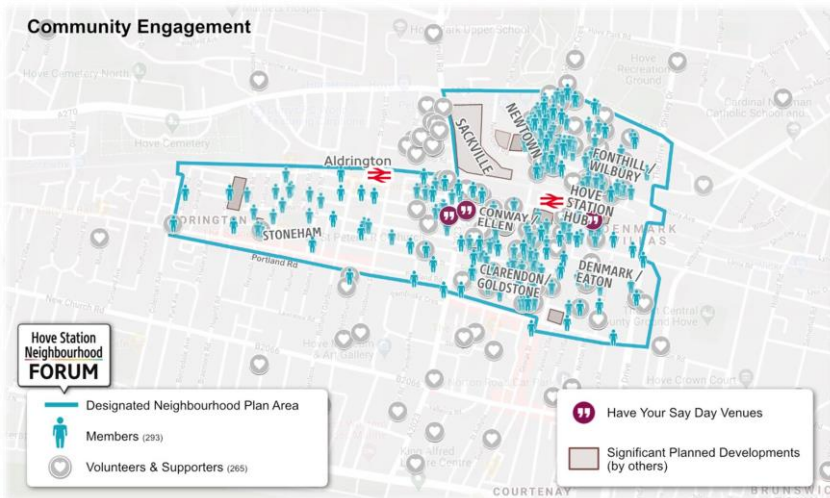
<sup>27</sup> [brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/public-life-public-space](https://www.brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/public-life-public-space)



~~1 of PART ONE.~~ Funding for these will need to come in part from the neighbourhood portion of CIL but may also require additional sources including regional and city- wide funds.

247239 The Forum intends to engage in implementing the Neighbourhood Plan and ensure that adequate resources are made available to secure the improvements necessary to create an attractive Station Quarter. For that reason, the Forum will expect to be involved in any significant decisions on funding for the implementation of the Neighbourhood Plan with all relevant agencies including the City Council and regional and government organisations. The priorities identified in Annex 1 should be taken into account by landowners and developers, the City Council and all other relevant agencies when considering planning, development and financial decisions affecting the neighbourhood plan area.

- End of PART ONE -





## ANNEX

### *Annexes to the statutory part (PART ONE) of Hove Station Neighbourhood Plan*

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*The improvements needed to create a fully integrated quarter*

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*A sustainability assessment of the Plan and the changes made in response*



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## ANNEX 1

# Priorities for Implementation

The following schedule sets out the improvements needed to Hove Station Quarter to create a fully integrated quarter. Several of these proposals are likely to be implemented as part of new developments, others will require major infrastructure investments, and some will be suitable for funding by the neighbourhood portion of CIL.

## Priorities for Implementation

Key: **H** High priority **M** Medium Priority **L** Low priority



### 1. Improvements to linkages / movement:

*For pedestrian and cycle-based movement a number of connections across or from the railway will require improvements or will need to be added:*

- H** The upgrade or rebuild of the existing Hove station footbridge to accessible standard.
- H** Pedestrian and cycle access route from Hove station through to Hove Park in the short term via Newtown Road and Goldstone Lane, in the longer term via the KAP development and a redeveloped Goldstone Retail Park.
- H** A new footbridge across the railway to the current station car park to connect the new development in the Sackville Trading Estate area with the station.
- M** A refurbishment of Fonthill Road railway bridge encompassing a widening of the pavements on either side and improved lighting. This must be carried out in conjunction with the road improvements as set out below.
- M** A wide sweep of steps from the station area down to the Conway street area as indicated Neighbourhood Plan PART TWO, Community Hub 1.
- L** The continuation of the segregated cycleway along Old Shoreham Road.
- L** Provision of missing footway provisions such as by the petrol station off Station Approach and provision of safe pedestrian crossing outside Hove Station for visually impaired.



*For car-based movement the following changes are proposed: the feasibility of all the following proposals will need to be examined as part of a traffic management plan for the area:*

- H** A link facilitating west to east movement from Sackville Road into Newtown Road.
- M** The reduction of carriage width under the Fonthill Road railway bridge to provide wide pavements and single lane alternative movement of cars under the bridge.
- M** Introduction of pinch points along Conway Street and Goldstone Villas in the vicinity of Hove Station.
- L** The opening up of Fonthill Road / Goldstone Lane southwards to allow better permeability of the area including bus circulation following redevelopment of the bus station. (This is related to redevelopment of the areas between the high-rise blocks of the Clarendon Estate).
- L** An improvement to the Sackville Road / Old Shoreham Road junction (see below).



## 2. Traffic management measures:

- H
- H
- M
- L

The preparation and implementation of an area wide traffic management scheme for the Hove Station Quarter.

The DA6 area should be fully incorporated into one of the adjacent Controlled Parking Zones (either T, N or R) ahead of significant development coming forward.

All development in the DA6 area should be essentially car-free, by which it is meant that residents will not be eligible for a Residents Parking Permit. In this way, it is intended to reduce vehicle congestion, parking pressure and create the opportunity for using the streets within the Plan area for things other than car parking.

Provision should be made for the Old Shoreham Road/Sackville Road junction to be reconfigured so as to allow a single stage pedestrian phase. This may require new development at the junction to be set-back marginally to enable three running lanes in each direction (two ahead/left and one right turning lane). The footprint of any development of those plots adjacent to the junction will be constrained by this requirement.



## 3. Public realm improvements:

- H
- H
- M
- L

Upgrades will be needed across the area in terms of road surfacing, including the creation of pinch points to reduce vehicle speeds.

Extensive street tree planting will be required as part of the developments as well as in surrounding streets to achieve a general environmental lift in the area. Improvements should include street tree planting along Goldstone Villas and Portland Road.

Special attention will need to be focussed on the station forecourts (both station buildings) and the exit area of the station foot bridge at Hove Park Villas.

The design of the links across the DA6 area will need to include breakout areas and pocket parks, small play areas, seating and water features and should be of highest possible standard as these features will determine the overall quality of the area.



## 4. Community hubs:

*Four community hubs are proposed, each will be different and respond to local needs & opportunities:*

- H
- H
- L

the area around Hove Station might include cycling facilities, an improved transport interchange, improvements to the footbridge and Goldstone Villas and improved facilities located in the Old Station building.

the area at the western end of Conway Street could focus on involvement of various existing community facilities and the detailed design of a pocket park.

Stoneham Area hub could aim at bringing back recently lost community facilities in the area.

## ANNEX 2

# Statement of Compliance

~~1 This Annex sets out how the Neighbourhood Plan (NP) meets the basic conditions which are required before the NP can come into force. The basic conditions are tested through the independent examination before the NP may proceed to referendum. This section refers and quotes extensively from the Neighbourhoods Plan Roadmap, published in 2019<sup>20</sup>~~

### ~~1.1 The Basic Conditions for neighbourhood plans:~~

- ~~i have regard to national policy~~
- ~~ii contribute to the achievement of sustainable development~~
- ~~iii are in general conformity with the strategic policies in the development plan for the local area~~
- ~~iv are compatible with EU obligations (as incorporated into UK law).~~

~~In preparing this plan the Forum has sought to meet these requirements in the following way:~~

#### ~~i National Policy:~~

- ~~2 The main source of national policies is the National Planning Policy Framework (NPPF). This is a concise document dealing with a wide range of planning matters. The key theme of the National Planning Policy Framework is the presumption in favour of sustainable development. Sustainability has social, economic and environmental dimensions.~~
- ~~3 In preparing the Neighbourhood Plan, the Forum has stayed very close to the Local Development Planning framework, mainly the City Plan Part 1 for Brighton and Hove and as such the Neighbourhood Plan pays full regard to the NPPF. The Forum has sought to prepare a plan which responds carefully to social matters, in particular housing and community needs, economic matters in responding to the opportunities offered locally for new and modern employment and environmental issues in that the Forum is calling for an environmental transformation for the better for the neighbourhood area. As expected, the Forum has focussed on local issues and only dealt with those where in the Forum's opinion there has been scope to provide a local dimension and added value to the City Plan process.~~
- ~~4 Table 6 below provides the references for the NPPF in relation to the policies of the Hove Station Neighbourhood Plan as well as the relevant references to the Brighton and Hove City Plan Parts 1 and 2.~~

<sup>20</sup> [https://neighbourhoodplanning.org/wp-content/uploads/NP\\_Roadmap\\_online\\_full.pdf](https://neighbourhoodplanning.org/wp-content/uploads/NP_Roadmap_online_full.pdf)

**Commented [RD7]:** Annex 2 now forms part of the Basic Conditions Statement supporting the Neighbourhood Plan.

Table 6 – NPPF and City Plan references / relationships to Neighbourhood Plan policies.

Policy ref.	Subject	Key links to NPPF	Key links to City Plan
Policy 1	Creation of Hove Station Quarter	NPPF section 5 also paras 81, 118, 122	CPP1: DA6, Hove Station Master Plan / SPD
Policy 2	Sackville Coalyard	NPPF section 5 also paras 81, 118, 122	CPP1: DA6, CPP2: SSA4
Policy 3	Goldstone Retail Park	NPPF section 5 also paras 81, 118	CPP1: DA6, Aspirational policy to cover the possibility of the site coming forward for redevelopment within the plan period
Policy 4	Bus Depot	NPPF section 5 also paras 81, 118, 122	CPP1: DA6, Hove Station Master Plan / SPD
Policy 5	Remaining Lands South of the Railway	NPPF section 5, also para 81, 93, 118, 122	CPP1: DA6, Hove Station Master Plan / SPD
Policy 6	Housing Mix and Tenure	NPPF para 61	CPP1: SA6, CP14, CP19, CP20, CPP2: DM1
Policy 7	Affordable Housing	NPPF para 62-64	CPP1: CP20
Policy 8	Housing for the Elderly	NPPF para 61	CPP1: CP19, CPP2: DM4
Policy 9	Employment	NPPF para 82 and 85	CPP1: DA6, CP2, CP3, CP4, CPP2: DM13, DM40
Policy 10	Design and Public Realm	NPPF para 91, 125 and 127	CPP1: DA6, CP12, CP13, CP16, CPP2: DM22
Policy 11	Tall Buildings	NPPF para 126	CPP1: CP12, SPG15, Urban Design Framework SPD, Hove Station Area Master Plan / SPD



Policy ref.	Subject	Key links to NPPF	Key links to City Plan
Policy 12	Community Facilities	NPPF para 92	CPP1: DA6, SA6; CPP2: DM9
Policy 13	Community Hubs	NPPF paras 28 and 92	CPP1: DA6, SA6, CP4, CPP2: DM9
Policy 14	Conservation	NPPF paras 185 and 193	CPP1: DA6, CP15; CPP2: DM26, DM27, DM28, DM29
Policy 15	Parking and Movement	NPPF paras 102-106	CPP1: DA6, SA6, CP9, SPD14 CPP2: DM33, DM35-DM36 Hove Station Area Master Plan / SPD
Policy 16	Developer Contributions	NPPF para 34	CPP1: CP7, CP13

## **ii. Contributing to Achieving Sustainability:**

5 This in essence means enabling growth to cater for the needs of current generations, but ensuring that growth doesn't mean worse lives for future generations.

6 The Neighbourhood plan contains a number of policies and proposals which aim to contribute to achieving sustainability. Several of these mirror the suggestions set out in the neighbourhood planning guidance and include:

- limiting transport implications from new developments by controlling car parking and requiring mixed transport provision, including accessible public transport, cycle facilities and safe and convenient pedestrian routes;
- reducing transport impact by encouraging mixed use development and making full use of the proximity of the railway and bus systems for transport needs;
- requiring good urban design, creating safe, attractive, convenient, well-connected streets and spaces;
- enabling provision of varied local employment opportunities;
- considering the enhancement of the natural environment including high quality landscapes;
- encouraging green development and local energy generation;

7 Several other areas of sustainable development are covered already by the adopted City Plan Part 1 and are therefore only referred to briefly in the Neighbourhood Plan. This includes issues such as affordable housing provision and the requirement for a good mix of housing of different sizes to meet local need.

8 Overall the Forum believes that taken together that the policies and proposals in the Neighbourhood Plan will make a considerable contribution towards sustainability as defined by the NPPF.

9 The following table sets out the sustainability impacts of the policies in the neighbourhood plan by policy against the criteria set out in the NPPF para 9.

Table 7 – Assessment of neighbourhood plan policies against NPPF criteria (NPPF para 8)

Policy ref.	Subject	Economic impact	Social Impact	Environmental Impact
Policy 1	Creation of Hove Station Quarter	✓	✓	✓
Policy 2	Sackville Coalyard	✓	✓	✓
Policy 3	Goldstone Retail Park	✓	✓	✓
Policy 4	Bus Depot	✓	✓	✓
Policy 5	Remaining Land South of the Railway	✓	✓	✓
Policy 6	Housing Mix and Tenure	-	✓	-
Policy 7	Affordable Housing	-	✓	-
Policy 8	Housing for the Elderly	-	✓	-
Policy 9	Employment	✓	-	✓
Policy 10	Design and Public Realm	-	✓	✓
Policy 11	Tall buildings	-	-	✓
Policy 12	Community facilities	-	✓	✓
Policy 13	Community Hubs	-	✓	✓
Policy 14	Conservation	-	-	✓
Policy 15	Parking and Movement	-	-	✓
Policy 16	Developer contributions	✓	✓	✓

✓ = Positive impact; - = Neutral impact; X = Negative impact

### iii. General conformity with strategic policies in the City Plan

- 10 — The Forum has worked closely with the City Council to ensure that the Neighbourhood Plan is generally in conformity with the Local Development Plan. This plan is of course a moving target in that City Plan Part 1, adopted since 2016, is now being followed by City Plan Part 2, with initial consultation during the summer 2018, with adoption likely in 2021. Part II is therefore at an early emerging stage, while the Neighbourhood Plan is more advanced and is likely to be adopted much earlier. Where there are potential impacts of Part II policies on the Neighbourhood Plan it is the Forum's view that as drafted (Autumn 2018) there are no problems and issues of concern for the Forum and Neighbourhood Plan. However, the Forum has not removed policies in the Neighbourhood Plan, because they are now related to policies in Part II of the City Plan as such adjustments would have to await adoption of City Plan Part 2.
- 11 — The Neighbourhood Plan aims to deliver its vision of a new Hove Station Quarter around Hove Station, which will be of benefit both locally and to the city as a whole. The Forum has called for some time for more ambition by the City Council for this Centre of Hove and it is gratifying that both policy and support now is moving in this direction not least to start detailing the plans and to create a functioning masterplan which will help integrate the various parts of the station quarter.
- 12 — The Forum is also advancing a range of transport, parking and environmental policies that will help shape the area. These are over and above City Plan policies, but do not conflict, rather they develop further those areas with the local insight that the Forum has.
- 13 — From our discussions with the City Council and our understanding of the City Plan Part 1 and 2, we believe that the Neighbourhood Plan is in general conformity with the City Plan.
- 14 — Table 6 above provides the references for the NPPF in relation to the policies of the Hove Station Neighbourhood Plan as well as the relevant references to the Brighton and Hove City Plan Parts 1 and 2.

#### iv. Compatible with EU obligations

- 15 A neighbourhood plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. This includes specific obligations relating to environmental impacts, habitat protection and human rights. The neighbourhood plan has addressed these requirements as set out below.
- 16 The Plan, and the process under which it was made, conforms to the SEA Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) as amended. Brighton & Hove City Council carried out a screening, as required by Regulation 9 of the Regulations, to determine whether the Neighbourhood Plan was likely to result in significant effects. The screening was subject to consultation with the three statutory environmental bodies; two of which responded and agreed with the conclusion that significant effects could arise and that SEA was required.
- 17 The Forum has been provided with assistance by AECOM to carry out a Strategic Environmental Assessment (SEA). This has included the production of and consultation on a Scoping Report, meeting the requirements of Regulation 12(5) and 12(6), and preparation of the Environmental Report alongside the Neighbourhood Plan in accordance with Regulation 12. The Environmental Report was subject to consultation alongside the draft Plan at pre-submission stage, in accordance with Regulation 13. The SEA came to the following conclusion:
- 4 The assessment found that the current version of the HSNP is likely to lead to long term positive effects, across the majority of SEA topics assessed. The HSNP supports proposals that are coming forward through the development management process for the regeneration of previously developed land. These proposals along with a Concept Masterplan and Options Study (2017) demonstrate that there is the opportunity for significant brownfield regeneration within the Neighbourhood Plan area, in particular development area DA6 proposed through the adopted City Plan. This has the potential to deliver a significant number of new homes and employment opportunities along with improvements to the public realm and sustainable transport modes, with significant long term positive effects for a number of SEA themes.
- 18 As part of the SEA screening a pre-screening exercise took place to provide an early indication to the Forum of whether the Neighbourhood Plan was likely to require further assessment under the Habitats Regulations. This is set out in Annex 1 of the SEA Screening Report, August 2016. This concluded that further HRA was not required by taking into consideration the vision and objectives of the Neighbourhood Plan, the location of the Neighbourhood Plan area in relation to European sites, and the conclusions of the HRA screening undertaken for the City Plan Part 1. This was subject to the same consultation as the SEA screening report, however no response was received from Natural England.
- 19 Since the HRA pre screening was undertaken, Brighton & Hove City Council has commissioned an updated HRA to support the draft City Plan Part 2 (which has now reached the pre-submission stage). The HRA considered the in combination likely significant impacts of all development allocated and proposed through the City Plan Part

~~1 and draft City Plan Part 2 and screened out significant adverse impacts on all designated European sites (as confirmed by Natural England's letter of response to the HRA consultation). The Neighbourhood Plan as submitted does not seek to allocate sites which are not already allocated or proposed through the City Plan and does not include policies which specify any quantum of development. It is therefore considered that the conclusions of the HRA undertaken by the City Council also apply to this neighbourhood plan and that no separate HRA is required. The HRA reports can be viewed on the Brighton & Hove Council website as supporting documents to City Plan Part 2 at: <https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposed-submission-stage-2020>~~

~~20 The submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and complies with the Human Rights Act. All those affected by the proposals within the Neighbourhood Plan have been adequately consulted and have had the opportunity to comment. The details of consultation that has been carried out on the Plan are outlined in the Consultation Statement.~~

~~21<sup>18</sup> It is therefore the Forum's view that the Neighbourhood Plan and plan preparation is compatible with EU obligations.~~

**ANNEX 3**

## Summary of Strategic Environmental Assessment

**Commented [RD8]:** Annex 3 is already included in the Strategic Environmental Assessment (SEA) supporting the Neighbourhood Plan.

~~1 The Strategic Environmental Assessment (SEA) for the Hove Station Neighbourhood Plan was received in May 2018.~~

~~2 Below is the summary of the SEA, including recommendations for changes to the plan. At the end of this Annex are set out the changes that have been made to the plan policies in response to those recommendations.~~

### ~~2.1 Non-Technical Summary~~

#### ~~What is strategic environmental assessment?~~

~~3 A Strategic Environmental Assessment (SEA) has been undertaken to inform the Hove Station Neighbourhood Plan. This process is required by the SEA Regulations.~~

~~4 Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.~~

#### ~~What is the Hove Station Neighbourhood Plan~~

~~5 The Neighbourhood Plan area covers the Hove Station area including part of the DA6 Hove Station area which relates to Policy DA6 in the Brighton & Hove City Council Local Plan. Prepared to be in conformity with the Brighton and Hove City Plan, it sets out a vision and a range of policies for the Neighbourhood Plan Area. These relate to a range of topics, including, but not limited to, landscape and townscape character, the quality of life of residents, tourism and the protection and enhancement of the environment.~~

~~6 It is currently anticipated that the Neighbourhood Plan will be submitted to Brighton & Hove Council in 2018.~~

~~7 This Environmental Report, which accompanies the current consultation on the Neighbourhood Plan, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (October 2017), which includes information about the Neighbourhood Plan area's environment and community.~~

**The purpose of this Environmental Report is to:**

- Identify, describe and evaluate the likely significant effects of the Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

**The Environmental Report contains:**

- An outline of the contents and main objectives of the Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Neighbourhood Plan;
- The likely significant environmental effects of the Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Neighbourhood Plan; and
- The next steps for the Neighbourhood Plan and accompanying SEA process.

**Assessment of alternative approaches for the Neighbourhood Plan**

- 5 Emerging evidence suggests that there is the opportunity to deliver significantly more housing and employment growth within the Hove Station development area (DA6) than envisaged through the adopted City Plan in Policy DA6, which proposes a minimum level of employment and housing growth subject to a number of criteria.
- 6 The adopted City Plan recognises that while the Hove Station development area (DA6) offers a significant opportunity for regeneration, there are also a number of constraints that need to be a factor in decision-making. These include a declared Air Quality Management Area, which falls partially within the Neighbourhood Plan Area and development area DA6, as well as several junctions in the area being near or at capacity. There is also a significant number of designated and non-designated heritage assets within and surrounding the Neighbourhood Plan Area.
- 7 Taking the above into account, it was considered appropriate for the SEA to focus on the overall level of growth to be delivered within the Hove Station area during the life of the Neighbourhood Plan. In particular, there is a need to consider the relative merits of a lower level of growth closer to the minimum proposed in the adopted City Plan compared to the higher level of growth being proposed by



developers. As a result, two options were identified for detailed assessment through the SEA. These were:

- **Option 1:** Lower level of growth in line with the minimum targets set out in Policy DA6 of the adopted City Plan (i.e. delivery of 525 residential units, retention/replacement of 13,000m<sup>2</sup> of employment floorspace).
- **Option 2:** Higher level of growth in line with emerging evidence (i.e. delivery of 1,233 to 1,333 residential units and retention/replacement of 23,800m<sup>2</sup> of employment floorspace).

8— These two options were appraised as ‘reasonable alternatives’ against both the baseline and relatively (i.e. against each other). They were considered through the SEA Framework of objectives and assessment questions developed during scoping and the two options have been ranked in terms of their sustainability performance against the relevant SEA Theme.

9— The detailed findings of the appraisal are presented in Table 4.1 in the main body of the Environmental Report. The assessment found that Option 2 is more likely to result in long term significant positive effects as it provides an opportunity to regenerate large areas of previously developed land within the Neighbourhood Plan area and deliver significant benefits to the local community, which includes new homes and employment opportunities as well as improvements to sustainable transport modes and the public realm.

10— Option 2 was progressed as the preferred approach by the Hove Station Neighbourhood Forum as it is in line with the aspirations and policies set out in the adopted City Plan and reflects emerging evidence.

## Assessment of the current version of the Hove Station Neighbourhood Plan

11— The current consultation version of the Neighbourhood Plan presents planning policies for guiding development in Neighbourhood Plan Area. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA topics:

- |                                       |                                   |
|---------------------------------------|-----------------------------------|
| 1. Air Quality                        | 4. Land, soil and water resources |
| 2. Climate change                     | 5. Population and community       |
| 3. Landscape and historic environment | 6. Health and wellbeing; and      |
|                                       | 7. Transportation.                |

12— The assessment found that the current version of the HSNP is likely to lead to long term positive effects, across the majority of SEA topics assessed. The HSNP supports proposals that are coming forward through the development management process for the regeneration of previously developed land. These proposals along with a Concept Masterplan and Options Study (2017) demonstrate that there is the opportunity for significant brownfield regeneration within the Neighbourhood Plan area, in particular development area DA6 proposed through the adopted City Plan. This has the potential to deliver a significant number of new homes and employment opportunities along with improvements to the public realm and sustainable transport modes, with significant long term positive effects for a number of SEA themes.

13— There are uncertainties around the nature and significance of effects on transport and air quality given the lack of evidence relating to impacts on traffic. However, the assessment concluded that residual effects are still likely to be positive given the opportunity to regenerate the area and promote Hove Station as a sustainable transport hub for the city. This along with the delivery of significant homes and employment opportunities could help to reduce commuting by private vehicle. It is considered that this has the potential for a long term positive effect on transport and therefore indirect positive effects for air quality and climate change. It will be important for any proposal coming forward to demonstrate how they will minimise impacts on traffic and improve sustainable transport modes.

14— Policies within the adopted City Plan and the HSNP should ensure that development coming forward is sensitively designed and that building heights are limited so that there are no residual negative effects on the historic environment.

### Recommendations at this current stage

15 A number of recommendations have been made for improving the sustainability performance of the current version of the HSNP. These are summarised as follows:

- 16 To ensure that the historic environment is adequately considered as part of any development management process it is recommended that Policy 14 is strengthened by including a need for development to contribute towards the conservation and enhancement of historic environment features.
- 17 It is recommended that the relevant Conservation Area Appraisals are referenced within the HSNP.
- 18 It is recommended that Policy 10 (Design and Public Realm) is strengthened further through alignment with, and direct reference to, the Brighton and Hove Green Infrastructure Network Study.<sup>29</sup>

### Next steps

16 This Non-Technical Summary and Environmental Report accompanies the Pre-Submission version of the Hove Station Neighbourhood Plan for consultation.

17 Following consultation, any representations made will be considered by the Hove Station Neighbourhood Forum, and the Non-Technical Summary and Environmental Report will be updated as necessary. The updated Non-Technical Summary and Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Brighton & Hove City Council, for subsequent Independent Examination.

18 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Brighton & Hove City Plan.

19 If the subsequent Independent Examination is favourable, the Hove Station Neighbourhood Plan will be subject to a referendum, organised by Brighton & Hove City Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Hove Station Neighbourhood Plan will become part of the Development Plan for Brighton & Hove City, covering the defined Neighbourhood Plan area.

<sup>29</sup> Brighton and Hove Council (2009) Green Infrastructure Network Study [online] available at: <http://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-one-background-studies>

## Changes made to the Neighbourhood Plan policies in response to the SEA recommendations

The following changes were introduced to the plan in response to the SEA:

1. At the end of Policy 14, add the following para:

New developments will be expected to contribute towards the conservation and enhancement of historic environment features.

1. What is referred to in the SEA recommendations as Conservation Area Appraisals exist only as Conservation Area Character Statements and these are already referred to in 4.9 Conservation.
2. The following additional text is proposed to Policy 10:

Development proposals within the DA6 part of the Neighbourhood Plan area should provide opportunities to bring nature into the city by substantially increasing the amount of green space in the area (horizontally and vertically). Developers should seek opportunities to create new pedestrian and cycle links as green corridors through the area, including linking up pocket parks and other open space.

### Add to reason:

Whereas there are no designated wildlife sites in the Neighbourhood Plan Area, policy 10 seeks to substantially strengthen the amount of green space (horizontally and vertically) and create a number of pedestrian and cycle links that can also be planted up and that will eventually create corridors with interspersed pocket parks. These can deliver multiple benefits efficiently and have important benefits for healthy lifestyles and community development. There will then be a reference to the Brighton & Hove City Council (2009) Green Infrastructure Study.