

You said	We responded																					
1. General comments																						
<p>Overall response to Draft SPD (received via consultation portal)</p> <table border="1" data-bbox="203 411 1173 683"> <thead> <tr> <th></th> <th>Total responses</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Very positive</td> <td>14</td> <td>44</td> </tr> <tr> <td>Positive</td> <td>11</td> <td>34</td> </tr> <tr> <td>Neutral</td> <td>4</td> <td>13</td> </tr> <tr> <td>Negative</td> <td>1</td> <td>3</td> </tr> <tr> <td>Very negative</td> <td>2</td> <td>6</td> </tr> <tr> <td>TOTAL responses</td> <td>32</td> <td>100</td> </tr> </tbody> </table>		Total responses	%	Very positive	14	44	Positive	11	34	Neutral	4	13	Negative	1	3	Very negative	2	6	TOTAL responses	32	100	<p>Overall positive response welcomed.</p>
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<p>Though the changes proposed for the area in question seem ambitious and well thought out, I am concerned about the potential impact of additional traffic along Fonthill Road, Newtown Road, Wilbury Avenue and Wilbury Gardens. Newtown Road (between Fonthill Road and Hove Park Villas) in particular is especially unsuitable for the levels of traffic is currently sees.</p> <p>As your report acknowledges rat-running is already a problem along these residential streets. A low traffic neighbourhood should surely be considered here? Traffic filters should, in my opinion, be used to prevent through traffic. My preference would be at the top of Fonthill Road, near the junction with Old Shoreham Road, Wilbury Avenue before the junction with Hove Park Villas and finally at the top of Wilbury Gardens.</p>	<p>Noted. The draft SPD reflects planning policies in higher-level documents (including the City Plan) while providing a further level of clarity regarding how these could be applied to the Hove Station Area. A range of further studies will, however, be required in relation to specific development proposals in order to ensure they can be accommodated within the masterplan area without having unacceptable impacts within the wider local area and beyond. Such studies would include transport impact assessments and further consultations with stakeholders.</p>																					
<p>I am very, very positive about the plans. I have yet to see good reason to trust that the council will actually follow through on any plan that</p>	<p>Noted.</p>																					

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<p>reduces parking and genuinely promotes walking and cycling rather than painting the number 20 on things, throwing your hands in the air, and walking away. Money where your mouth is please. Remember how you said there was some sort of 'emergency' to do with the climate? Imagine if you'd tackled the COVID emergency the way you're (not) tackling the climate emergency. Grips are available. Please get one.</p>	
<p>I am privileged to be housed in a Council flat. I feel strongly about more social housing being provided in Brighton and Hove as so many families do struggle to keep up with the ongoing raise on rents. Many of the new buildings in the city do not guarantee a fair proportion of social housing. I hope this scheme will guarantee that, if not it'll be just another way to gentrified the city.</p>	<p>Noted. The council seeks to negotiate affordable housing provision as an integral part of all new major housing proposals, as set out in the Brighton & Hove City Plan.</p>
<p>Not happy with any of the planning directives</p>	<p>Noted.</p>
<p>Could do with more clarity on types of housing and whether there will be more family housing in keeping with the needs of the area, as opposed to further small units and apartment blocks.</p>	<p>Noted. The City Plan includes a policy which seeks a range of different types of housing; however, this will to some extent be dictated by the sites and development opportunities available in the Hove Station area. The council also seeks to negotiate affordable housing provision as an integral part of all new major housing proposals, as set out in the Brighton & Hove City Plan. Its negotiations are informed by a range of factors, including regular assessments of local housing needs.</p>
<p>This is a clearly neglected area and underused. There is little information on the employment/business use which will be encouraged - moving away from the light industry/consolidating these zones (which encourage heavy traffic and are less suitable in close proximity to</p>	<p>Noted. The types of employment/business uses to be encouraged will be governed by City Plan policy considerations – which include providing for local business needs.</p>

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<p>residential areas) would seem appropriate. I am encouraged by the move to liveable spaces and the focus on planting - I would also hope that the principles of 5/10 minute neighbourhoods are taken into account - this would seem eminently feasible, and if pedestrian and cycle access is improved would also benefit adjoining areas such as Poet's Corner/streets west of the area.</p>	
<p>2. Planning Policy Context</p>	
<p>SPD should clarify that it is a guidance document, is aspirational and that changes in land ownership, the wider legislative context and demographics will mean that it will evolve over time – with each future planning policy continuing to be considered on its own merits</p>	<p>Noted. All planning decisions should be made with regard to the relative status of relevant planning documents, their age and other material considerations (including the merits of the particular proposal). In this respect, the status of the SPD, once adopted, will fall within this range of considerations.</p>
<p>Fig.2.1: This map fails to show the boundary of the Hove Station Conservation Area which occupies the eastern part of the Masterplan Area, and is likely to be significantly affected by development within the Masterplan area. What kind of Supplementary Planning Document ignores such important existing planning policy criteria? Only one, we suggest, that promotes development priorities over heritage considerations. (Brighton Society)</p>	<p>Figure 2.1 is an extract from the Brighton & Hove City Plan Part 1, showing the DA6 Hove Station Development Area (DA6). None of the Development Area plans show Conservation Areas, but these are shown elsewhere in the City Plan. Figure 1.2 of the draft SPD shows the Conservation Area's locational relationship with regard to the masterplan area.</p>
<p>Para 2.9 <i>“The areas identified as suitable for tall buildings generally have limited visual impact on ‘sensitive’ views (conservation areas and other heritage and landscape assets – and are close to public transport routes and local shops and services.)”</i> We question the accuracy of this statement. The listed Hove Station and footbridge, the listed Station</p>	<p>Existing planning policy in the City Plan sets out the range of considerations that need to be carefully considered as part of any planning application involving tall buildings proposals. Heritage considerations will always be key in this respect, where conservation areas and/or listed buildings may be visually affected.</p>

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<p>pub and Ralli Hall and the Hove Station Conservation Area will all be impacted by large scale tall building developments. (Brighton Society)</p>	
<p>Para 2.10 “...<i>having potential to accommodate ‘taller’ development.</i>” The use of the word taller conflates the meaning of “taller” with “higher density” development. Tall buildings are not necessarily the most appropriate solution in many sensitive urban situations. What is important in locations such as those near Hove Station is that new development should accommodate “higher densities”. Not be taller. Taller buildings - particularly those up to 15 storeys - <i>do</i> have “negative impacts on the listed “<i>Hove Station and other surrounding heritage assets and residential areas</i>”. They have a significantly detrimental effect on the existing appearance and character of the heritage assets and the adjacent Conservation Areas, which are much lower in height and quite different in character and scale from the tall blocks such as the recently approved 18-storey tower approved in Ellen Street and the conglomeration of tall buildings up to 15-storeys of the Sackville development just to the north-west of the station. (Brighton Society)</p>	<p>The principle of taller buildings being developed in the Hove Station Area has long been established and is referenced in the above-mentioned planning documents. All planning applications for tall buildings must be accompanied by a Tall Buildings Statement that ensures consideration has been paid to a wide range of issues (including heritage issues) and that these issues have been satisfactorily addressed. Tall Building Statement criteria are set out in more detail in SPD 17 Urban Design Framework.</p>
<p>Para 2.11 “<i>The combination of existing tall buildings, good transport links, and limited conservation constraints provides the Hove Station area with opportunities for tall building development. These sites are at the heart of the masterplan area.</i>” So are the listed Hove Station and footbridge, and the listed Station pub. The Hove Station Conservation Area occupies the eastern part of the Masterplan site and will be detrimentally affected by developments within the Masterplan area, particularly tall buildings. Para 2.11 in its determination to promote tall building development, fails to acknowledge the importance of the Conservation Area, the listed buildings within it and the likely impact of tall buildings upon them. It</p>	<p>Please see above response.</p>

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<p>does not discuss the planning constraints which are required to minimise the effect of new development upon the Conservation Area and listed heritage buildings. (Brighton Society)</p>	
<p>Having examined the consultation documentation, Highways England has no specific comments on the Hove Station Area Masterplan (SPD). However, we note that the Masterplan area focuses on part of the DA6 Hove Station development area, for which the City Plan Part Two provided minimum development quotas. As per our attached response to the City Plan Part Two Update on 30th October 2020, Highways England is continuing to liaise with Brighton and Hove City Council and their transport consultants Systra with regard to the supporting Transport Evidence Base. In particular, we have expressed concerns with the modelling undertaken, and until the outstanding matters relating to the modelling are resolved, Highways England is not able to accept the Transport Assessment in support of the City Plan Part 2 and therefore the CPP2 itself. Accordingly we are not satisfied that CPP2 will not have a detrimental impact on the Strategic Road Network (<i>the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109</i>). Highways England is continuing and will continue to work collaboratively with the City Council to resolve all outstanding matters to our mutual benefits. (Highways England)</p>	<p>Noted. BHCC will continue to work collaboratively with Highways England in order to ensure that highways issues are fully considered in the City Plan Part 2.</p>
<p>As part of the various discussions and negotiations with the Local Authority Planning Department there were ‘principles’ that became established that seem to have been ignored or possibly superseded by the SPD. The briefing note dated November 2020 declares that the masterplan will provide guidance that distils and integrates higher level policies in the Brighton & Hove City Plan and the emerging Hove</p>	<p>The draft SPD proposes greatly enhanced access to the western side of the station from Conway Street (accessed from Goldstone Street). This is considered an integral element of the overall masterplan proposal, with regard to unlocking the development potential of the Conway Street</p>

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<p>Station Neighbourhood Plan (“NP”). The SPD is predicated on intensive development on the station car park and eastern bus garage (“Station Rise”). This is in conflict with the NP and, more significantly, will close off in perpetuity an opportunity for enhanced access to the station from its western frontage to Goldstone Street. It will be present as a barrier to the station which will dominate and overpower this Listed Building. (Matsim Properties Ltd)</p>	<p>Industrial Area – and connecting and integrating this area and the station to nearby eastern and southern neighbourhoods.</p>
<p>3. Site and context analysis</p>	
<p>Site Context</p>	
<p>Site Context (paras 3.3 – 3.6) Important facts such as that Hove Park (mentioned in para 3.4, and illustrated in Fig 3.3) is locally listed, the “<i>deteriorated pedestrian footbridge</i>” is Grade 2 listed and the Station pub illustrated in Fig.3.2 is also listed are not mentioned. (Brighton Society)</p>	<p>The first bullet point under paragraph 3.13 makes clear that the listing for Hove Station includes the footbridge. This section will be amended to include reference to all of the locally listed heritage assets within the masterplan area, the stings of which may potentially be affected by redevelopment, including the Station public house. Hove Park will also be referenced as a locally listed park/garden and it is acknowledged that view of the masterplan area can be experienced from the park.</p> <p>Recommendation</p> <p>Amend para 3.13 3.13 There is one listed building within both the study area and the Conservation Area, and this comprises the Grade II Listed Station Building. The current station building dates from around 1879, though the original station building from 1865 is adjacent to it on Station Approach. The listing</p>

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	<p>includes the glazed canopy to the south of the current station building and the pedestrian footbridge over the railway line.</p> <p>Add new paragraph 3.16 following existing para. 3.15 and before the next section headed ‘Movement and Access’ (and amend the numbers on subsequent paras accordingly:</p> <p>3.16 Other important heritage assets include ‘The Station’ public house (100 Goldstone Villas) 101 Conway Street and Fonthill Road railway bridge (all within the masterplan area and ‘locally listed’) and nearby Hove Park (also locally listed) to the north of Shoreham Road, where longer range views of the masterplan area (including the Clarendon Ellen high rise residential blocks) are visible.</p> <p>(Add illustrations showing the locally listed heritage assets prior to publication of final document)</p>
<p>Heritage (paras 3.12 – 3.16) These paragraphs and accompanying illustrations only list and describe the Heritage assets affected by the Masterplan proposals. There is no discussion of likely impacts or how planning impacts could be minimised on those assets by out of scale, unsympathetic and tall buildings in the close vicinity. (Brighton Society)</p>	<p>As referenced in relation to other comments made by the Brighton Society, there are a range of existing planning documents that are and will continue to be used in relation to development proposals affecting heritage assets. None of these existing policy considerations are overridden by proposals in the draft SPD.</p>
<p>Para 3.28 <i>“There is potential for the spatial relationship between tall buildings to realise a distinctive townscape, particularly in clustering close to the station to create an overall landmark within the wider townscape – while of course - being mindful of key heritage</i></p>	<p>There is no contradiction intended here. Suitably clustered tall buildings can serve as a landmark within a wider area (in this instance, as a landmark denoting the station quarter and proximity of the station) without being sited ‘hard’ against heritage assets in a manner that would be visually harmful.</p>

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<p><i>considerations.</i>” This sentence attempts to combine two mutually contradictory policy statements into one. (Brighton Society)</p>	<p>The challenge to design appropriately in respect of heritage assets requires due care and skill, along with detailed scrutiny and accompanying dialogue with the local planning authority as part of the planning application process.</p>
<p>The designated heritage assets within and adjacent the masterplan area, viz. Hove Station and the northern Ticket Office (both Listed Grade II), Ralli Hall (Grade II) and Hove Station Conservation, are likely to be impacted in their setting by buildings to the height indicated as being appropriate (i.e. up to 17 storeys). An appropriate heritage impact assessment of the effects on the settings as part of the significance of these heritage assets should be required as part of any scheme that comes forward as a consequence of the SDP. (Historic England)</p>	<p>Noted. Heritage impact assessments (along with wider assessments as required under BHCC’s planning policies in respect of tall buildings proposals) will be required for all such proposals.</p>
<p>We strongly advise that the conservation team of the City Council is closely involved throughout the preparation of the SPD. They are best placed to advise on local historic environment issues and priorities (including access to data held in the Historic Environment Record), how the masterplan or site proposal can be tailored to minimise potential adverse impacts on the historic environment, the nature and design of any required mitigation measures, together with opportunities for securing wider benefits for the conservation and management of historic assets. (Historic England)</p>	<p>BHCC’s Heritage team has been involved in preparation of the SPD and will be closely involved in assessing and advising on any tall building proposals that come forward, both within the area covered in the draft SPD and elsewhere in the city.</p>
<p>Land use and ownership</p>	
<p>Para 3.7 L – we do wonder if there should be a reference to potential issues with pollution re. run-off of water from the car wash. The</p>	<p>It would not be appropriate for the draft SPD to discuss the issue of potential pollution that may or may not be caused by an existing business in the area. Such issues are the</p>

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removal of this facility is alluded to in para 5.4: Station Approach (Hove Civic Society)	responsibility of other agencies as appropriate to the nature of any problem deemed to being caused.
Page 15, image 3.8. The ticket office has long since been removed (Hove Civic Society)	<p>Noted. This error had also been noted internally (although failed to be picked-up in editing of draft document) but will be amended for the final version of the SPD</p> <p>Recommendation Amend caption to image 3.8, removing reference to ticket office. Amend para 3.13, removing reference to ticket office. Amend image 3.6 to remove listed building shown on north side of railway.</p>
<p>On Figure 3.4 Matsim Properties Limited is identified as owning 1-3 Ellen Street. Please can this be corrected to Watkin Jones within the next version of the SPD.</p> <p>On page 50 Watkin Jones is referred to as Watkins Jones. Please can this be corrected within the next version of the SPD. (Savills on behalf of Watkin Jones)</p>	<p>Noted.</p> <p>Recommendation Amend figure 3.4 to show 1-3 Ellen Street in ownership of Watkin Jones – and amend to show site F under ownership of Matsim (as opposed to Harket Properties) to reflect recent land transaction.</p> <p>Amend ‘Watkins’ Jones to read ‘Watkin’ Jones on page 50.</p>
Positive and negative influences	
Fig.3.13 Existing positive influences – these are rather dreary and indistinct examples, showing very little that looks in any way positive. There are no captions either - which there should be. Surely better and	Noted. It is agreed that some text to accompany the images in figs 3.13 and 3.14 would be helpful in clarifying the positive and negative influences they are intended to depict.

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<p>more attractive aspects of Hove’s heritage and urban environment exist – or is this a deliberate attempt to show the area in the worst possible light? The two- storey brick Bus Depot building on the corner of Fonhill Road and Conway Street is shown as a positive influence – yet its survival is threatened by the Masterplan SPD – see item 1 of Table 3.1 – objectives on p.22. (Brighton Society)</p>	<p>Recommendation Add text to figs 3.13 and 3.14 to further clarify nature of positive and negative influences that images are intended to depict.</p>
<p>Figs 3.14 Existing negative influences – the central image shows the locally listed Dubarry building on the right and the Grade II listed footbridge in the centre – are these two heritage assets really to be classified as negative influences? Why are far less attractive features such as the carwash on Station Approach and the filling station next to it not shown? Both are eyesores within the Conservation Area. Captions to the images should be included (Brighton Society)</p>	<p>The image is focussed on the footbridge, which is in need of upgrading as referenced in the document (and in many of the representations received). This issue can be further clarified when adding captions to the images as recommended above.</p>
<p>Objectives</p>	
<p>Table 3.1 - Item 5: - Enhance Station setting - We agree with this objective. It is probably the most important beneficiary of any planning gain resulting from new planning applications in the Hove Station area. But it should include the objectives of getting rid of - or re-location of - the eyesores of the carwash and the filling station, both of which are crucial to any improvement to the area. (Brighton Society)</p>	<p>The objective of removing these land uses is referenced in 5.4 ‘Station Approach’ under Section 5 ‘Site Specific Opportunities’</p>
<p>Table 3.1 - Item 6: - Improve Station accessibility. We agree that the footbridge should be upgraded to improve its condition and appearance, and to provide facilities for disabled access. Bearing in mind that the footbridge is a Grade II listed structure, how this improvement work is carried out is vitally important to ensure that</p>	<p>Noted.</p>

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<p>the character of the footbridge is respected and enhanced by the improvements. (Brighton Society)</p>																						
<p>4. Area wide strategy</p>																						
<p>Broad response to ‘improving the area’ (received via consultation portal)</p> <table border="1" data-bbox="203 715 1191 986"> <thead> <tr> <th></th> <th>Total responses</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Very positive</td> <td>17</td> <td>53</td> </tr> <tr> <td>Positive</td> <td>12</td> <td>38</td> </tr> <tr> <td>Neutral</td> <td>0</td> <td>0</td> </tr> <tr> <td>Negative</td> <td>0</td> <td>0</td> </tr> <tr> <td>Very negative</td> <td>3</td> <td>9</td> </tr> <tr> <td>TOTAL responses</td> <td>32</td> <td>100</td> </tr> </tbody> </table>		Total responses	%	Very positive	17	53	Positive	12	38	Neutral	0	0	Negative	0	0	Very negative	3	9	TOTAL responses	32	100	<p>Overall positive response welcomed.</p>
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<p>I hope the council means *actually* providing for cycling along best practice Dutch/Danish principles, and not the narrow, unmaintained and 90-degree turn-ridden 'provision' that we see elsewhere in the city.</p>	<p>Noted. The draft SPD sets out very positive objectives with regard to the provision of the quality and connectivity of the cycle network and associated infrastructure.</p> <p>It is worth noting that there is a range work in progress by the council towards a citywide strategy for modal shifts away from cars to walking and cycling. The council has recently commenced work on developing a citywide <i>Low Traffic Neighbourhood policy and strategy framework</i> which could be</p>																					

You said	We responded
	<p>adopted by the end of this calendar year. This document will provide a means for assessing requests, eligibility and feasibility criteria for Low Traffic Neighbourhoods (LTNs) in the city – which would then enable the council to set out a priority list and deliver LTNs based on annual funding availability via the Local Transport Plan (LTP).</p> <p>The Local Cycling and Walking Infrastructure Plan (LCWIP) and LTP 5 currently being drafted by the council will be major factors in influencing any priority LTN area - and the council has also currently submitted an Expression of Interest for a ‘Mini Holland’ scheme to be funded for the Wish and Westbourne area.</p> <p>Cycle infrastructure will be designed according to Gear Change strategy and the associated technical design guidance - LTN 1/20 guidance provided by the Department for Transport. An update to the existing ‘Manual for Streets’ is expected to be published imminently.</p>
<p>I live in the area and I think the move to make it more sustainable is great. Traffic on Clarendon Road can be quite bad. As a resident and cyclist I would like some improvement on that too.</p>	<p>Noted. The draft SPD sets out a strategy to alleviate the existing ‘rat-running’ situation, in order provided a people (and cycle) focussed environment for the new urban quarter</p>
<p>It will cause more noise for residents already living here and over-crowding. The Hove Station plan should be scrapped immediately.</p>	<p>Noted. The draft SPD is intended to distil existing planning policy, which established the Conway Street Industrial Area as a strategic allocation (for new development) with the wider area. The SPD’s objectives include integrating a new sustainable community within the wider area, to the greater benefit of the city, while taking on board the needs of existing residents and businesses in the area.</p>

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The area is indeed largely a grey and unwelcoming 'traffic cut through' which would benefit greatly from such a scheme.	Noted.
I agree with the description of the challenges facing this area currently - inaccessibility and poor-quality environments. I would really like to see a focus on green landscaping and improving pedestrian and cycle access as well as improving the quality of social housing.	Noted. Green landscaping and improved cycle and pedestrian access are all key to the type of redevelopment of the area promoted in the document. Improving the quality (and supply) of social housing is also an objective that BHCC pursues through a range of means – including planning, as a provider of affordable housing and in its environmental health role.
There is a need for improved pedestrian and cycling facilities & safety	Noted. These are all key elements in the draft document.
The video is well presented and helpful. It explains complex planning regulations/ideas quite clearly. I appreciate that.	Noted. The positive feedback is welcome.
The area needs to be regenerated but it has to be realistic. New homes, new meeting places, smarter links, more provision for cycling etc sounds good. But new jobs? How will it create more jobs? What sort of commercial premises are you thinking? Same with homes. Sounds good but how affordable? Connecting the Hove Park area with say Church Road is pretty grim at the present and it would be good but it needs to be more than decorative.	The details of the types of employment floorspace sought will vary depending on the nature of future planning applications received, the local market, local business needs and a range of other factors that will need to be examined as part of the wider implementation process in delivering the redevelopment of the area.
The city has enough cycle lanes, we need to stop pushing cars out and making parking better for local residents	Noted. While cycling is a key aspect of the draft SPD and an important strategic objective of BHCC, future development proposals will need to be carefully assessed with regard to ensuring local needs in the locality are adequately addressed.

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Reducing traffic is much needed Planting of more street trees is needed as many have been felled in recent years. Any additional greening and planting in the area is very welcome.	Noted – all of these are promoted in the draft SPD.																					
Need to improve access to, and condition of, existing railway bridge crossing including full disabled access. Very supportive of second diagonal railway crossing	Noted. Welcome support.																					
I think you could go further on the pedestrian/cycle green route by enhancing to a "green corridor" (no vehicles) to Hove Park.	Noted.																					
Positive in principle	Noted and welcomed.																					
Public Realm strategy																						
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Positive about this but not 100% sure about taller building																						
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<p>Taller buildings should be kept to a minimum as not in keeping with this part of town. We already have a proliferation of large apartment blocks going up across the city.</p>	<p>Concerns regarding taller buildings are noted. The principle of taller buildings in the Hove Station Area has been long-established in a range of planning policy documents and this principle is consolidated in the City Plan Part 1. The draft SPD is a document that supplements adopted planning policy – and (with regard to tall buildings) provides a further level of detail in respect of the potential heights and clustering of any tall buildings that are proposed within the core masterplan area. It should, however, be noted that any proposals for tall buildings in the area (or anywhere else in the city) will be required to be accompanied by a detailed analysis, with regard to a wide range of considerations to justify such issues as design, bulk, height, massing, impact on the local and wider environment etc – as required in the City Plan Part 1 and other relevant planning documents.</p> <p>Please see above response</p>
<p>Certainly in principle and particularly in this area where the gradient and barriers (e.g. trainline) make navigation difficult, considering building frontages an impact is key. Too many areas are restricted currently by fencing, making it a frustrating area to walk around, and I would like to see vennels and footpaths inserted. However, I have some concern that many of the areas seem designated as high rise - particularly re sustainability of this both in terms of building but also usage (although I do think flats can be suitable housing for people at all stages of life, buildings and environments around need to be considered carefully so that they are not 'rabbit hutch' type, unsuitable for families, but rather have access to green space, adequate storage etc.)</p>	
<p>Am not a big fan of tall buildings - you only have to look at the existing blocks of flats to understand the detrimental effect on the area creating wind blown areas and eye sores</p>	
<p>The buildings are too tall and have put developers wants over long term enjoyable living for residents. I am not keen on very tall building as they are less good for families.</p>	
<p>Concerns that concentration of tall buildings may lead to wind-tunnelling Greater need for green/social spaces within the area</p>	

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<p>I strongly object to any tall buildings in Hove. I cannot see how they play a positive role in the townscape. Compare with the buildings around Hove park (2-4 stories) which are much more sympathetic to the surroundings and residential areas.</p> <p>All other aspects seem fine.</p>	
<p>I understand and agree the bus depot ideas except that it would be most inconvenient to close off part of Conway Street. This is the shortest way to walk from the station to Sackville Road, and the houses and bus stops there. The bus company should have to live with the inconvenience of having its site divided by Conway Street. That is no worse than now.</p>	<p>The future siting of a consolidated bus site will need to be carefully considered in terms of impact on movement and access within the area, in order to ensure that the principles of the masterplan with regard to access and permeability are delivered. At this moment in time, it is not possible to identify the exact footprint that a consolidated bus depot would occupy. The nature of future land deals will be important in determining this. An arrangement that did not block off Conway Street would be preferable would clearly be preferable if this can be achieved.</p>
<p>- Movement: routes and connections</p>	
<p>Document is only focussed on local context and impact on local neighbourhoods. It should acknowledge wider context including movements into and out of the city, commuting to and from locations in wider region, understanding and maintaining traffic flows, need for transport assessments. ()</p>	<p>The draft SPD focusses on urban design issues within the Hove Station Area – particularly regarding the ‘core masterplan area’ on the south side of the railway. The wider strategic context is already covered in the City Plan and supplementary guidance including SPD17 Urban Design Framework, which have been prepared with regard to the wider city and beyond. Future development proposals within the area covered by the draft Hove Station Area SPD will, of course, need to be accompanied by appropriate transport studies and proposals to ensure such issues are adequately addressed.</p>

You said	We responded
<p>The principle of traffic calming is essential, but it needs to fit in with the wider context of the city, or the masterplan may be accused of merely displacing traffic to surrounding areas. Ideally, the traffic measures in the masterplan would be implemented concurrently with measures in surrounding areas. Specifically, this would mean the following:</p> <ul style="list-style-type: none"> - Protected space for cycling on Sackville Road/Hove Street - Closure of rat runs in Poets Corner and central Hove - An overall reduction of on-street parking across the area (Bricycles) 	<p>Noted. These detailed issues will need to be satisfactorily addressed and resolved at the implementation stage – and be brought forward and funded via future development proposals – along with other funding streams that may become available.</p>
<p>The speed limit across the area should be 20mph, with inspiration taken from the Dutch concept of 'autoluw', where low speeds are designed in, using strategically placed street furniture and planting to minimise the possibility of speeding and there is often no strict distinction between pavement and carriageway. (Bricycles)</p>	<p>Noted. The speed limits to be imposed across the area will need to be considered by the council in its role as the local highway authority.</p>
<p>The success of plans to reduce severance caused by the railway line will depend upon the detailed design. Bridges and tunnels need to be brightly lit, spacious and well-maintained, or they will feel unsafe to many people and thus be under-used. (Bricycles)</p>	<p>Noted. Proposals for new and improved connections across the railway are included in the draft SPD.</p>
<p>The railway bridge must have a lift on both sides, so it can be used by people in wheelchairs or with buggies or luggage. (Bricycles)</p>	<p>Noted. Any new and improved connections over the railway will need to be DDA-compliant, to meet the mobility needs of the widest range of users possible.</p>
<p>This bridge is crucial to the viability of the whole scheme. It is vital funds are sought from developers to make this bridge, which would link the two halves of the plan. The bridge must be of gentle enough gradient to permit all forms of human propelled traffic - buggies, double</p>	

You said	We responded
<p>buggies, wheelchairs, bicycles, non-traditional bicycles etc. (Brighton Active Travel)</p>	
<p>The measures in the Masterplan to mitigate vehicle domination and achieve modal shift are extremely welcome. However, Hove Station Neighbourhood must always be viewed in the context of the wider city. There will be no major modal shift towards active travel unless neighbouring areas are simultaneously dealt with using a similar approach - otherwise, the effect of closing the rat-runs in the Plan area will simply be to displace traffic elsewhere. Within Hove, this specifically means closing rat-runs in Poets' Corner and the roads to the east of the Plan area, as well as providing safe, fully-segregated cycle lanes on Sackville Road, which is currently treacherous for cycling and unpleasant, polluted and hard to cross for anyone walking or using a wheelchair. (Brighton Active Travel)</p>	<p>Noted. Future development proposals within the draft SPD area will need to be accompanied by Transport Impact Assessments that examine impacts on transport movements in the wider area – with appropriate mitigation measures planned and funded to improve the wider sustainable transport network.</p>
<p>Better arrangements for crossing Sackville Road would make for safer east-west cycling and walking movements. There need to be good cycling connections with Wilbury Avenue (the station's rear exit) and the Drive. (Cycling UK)</p>	
<p>The most direct route from the station to the south is down Goldstone Villas. This is not particularly pleasant (although this seems to be asserted in Paragraph. 3.3). There is a lot of central motor vehicle parking, traffic movements and side roads meaning that people walking and cycling are at risk and constantly checking for motor vehicle traffic. Blatchington Road is busy with traffic, George Street prevents cycling for much of the day and obstructs the cycle parking. One-way streets create further unnecessary inconvenience and conflict. The barriers created by A-roads and the 2 sub-optimal railway crossings need to be</p>	<p>Noted. The draft SPD promotes a sustainable pedestrian and cyclist focussed environment – with good connectivity with surrounding neighbourhoods. In order to meet this objective, the level of car parking in future development proposals will need to be low – while providing a strategy that will meet operational and mobility needs and not unacceptably impact on surrounding areas.</p>

You said	We responded
<p>overcome so that Hove’s attractive parks (Hove Park, Hove Rec) and the wider area is not cut off. Good local architecture such as Hove Station and the Ralli Hall which would benefit from better surroundings. The dominance of car parking both on street, on pavement and in business curtilages needs control. The official car parking quota in any new development needs to prevent excessive car dependence. Maintaining the current level of car parking will not assist modal shift to more sustainable transport. Car journeys have disbenefits to people. (Cycling UK)</p>	
<p>The Hove Station plan should link with and enhance the proposals for the A270 Old Shoreham Road and the developing network in the Local Cycling and Walking Infrastructure Plan. The route of Regional Cycle Network Route 82 is very indirect, as shown on your map, taking people on a detour via the Drive, unless people are willing to carry their own cycles over a steep footbridge. (Cycling UK)</p>	<p>The proposals for Fonthill Road as set out in the document would be expected to provide greatly improved cycle connections through the area between Old Shoreham Road on the north side of the railway and areas to the south.</p>
<p>Have any audits of cycling journeys been done to demonstrate cycling desire lines in this area? If not, they should be urgently completed to inform the Hove Station SPD. (Cycling UK)</p>	<p>Noted. Improved connectivity with local neighbourhoods on all sides of the masterplan area are key objectives of the draft SPD. Removing rat running will be a key element in freeing up space for cycles and pedestrians which, along with future development in the area, will help provide an environment that will attract new cycle movements to, from and through the area.</p>
<p>We would like to ensure that new developments comply with the Government’s latest guidance on cycling and walking – ‘Gear Change’ and Local Transports Note 1/20 on Cycle Infrastructure Design. (Cycling UK)</p>	<p>The draft SPD is but one document that would be used to assess future development proposals in the area. Any relevant guidance documents produced by central government or other bodies would be expected to inform future proposals as appropriate.</p>

You said	We responded
<p>Hove Civic Society has been closely involved with the preparation of the Hove Station Neighbourhood Plan (HSNP) and we welcome that the SPD picks up on many of the proposals in the HSNP. This applies not least to the recognition of the linkages needed to bring together the north and south of the DA6 area including improvements to Fonthill Road and the new link across the railway. We also welcome the imaginative thinking for Ellen Street, Station Approach and Hove Park Villas Square. (Hove Civic Society)</p>	<p>Noted. Support welcomed.</p>
<p>Page 25, fig 4.1: the HSNP part two suggests a wide sweep of stairs down from the station directly into the Conway street area – we particularly welcome the fact that this routeing is shown here and in later diagrams. It will of course be essential to manage pedestrian movement for those who cannot use stairs and lifts at either end of the existing footbridge would start dealing with that issue. (Hove Civic Society)</p>	<p>Noted. Support welcomed.</p>
<p>The draft SPD endorses and enhances many of the key proposals in the Neighbourhood Plan. These include essential actions to radically improve north-south connectivity that are needed to deliver integrated redevelopment that straddles the railway line’;</p> <ul style="list-style-type: none"> • the renovation/ replacement of the existing footbridge, with alternatives for providing full access to the station from the north via lifts; • the provision of a new footbridge to the west of the station to give pedestrians and cyclists from the MODA development easier access to the station; and • the elimination of the Fonthill Road-Goldstone Road ‘rat-run’ used by fast moving vehicles travelling under the tunnel and 	<p>Noted. Support welcomed.</p>

You said	We responded
<p>through the Conway Street area, by introducing one way traffic and providing a safer and more attractive route for pedestrians and cyclists</p> <p>These are the basic components a pedestrian- cyclist friendly movement framework which underpins the MP urban design scheme for the whole of DA6 south of the railway, with illustrative public realm and streetscape improvements to Conway Street, Ellen Street and Ethel Street. These proposals are welcome, not least because they are of the kind which the Forum has consistently promoted in its engagement, since 2016, with Matsim and then Watkin Jones, as they developed their consented proposals for the Hove Gardens ‘regeneration kickstart’ site. (Hove Station Neighbourhood Forum)</p>	
<p>We welcome the publication of the draft SPD and are grateful to Brighton and Hove City Council (“B&HCC”) for the discussions which have taken place both prior to, and during, the consultation period. A fundamental aim of the draft SPD is to regenerate the area as a vibrant and sustainable mixed-use community, and this is enthusiastically supported by Moda Living. The draft SPD focuses on the needs of pedestrians and promotes the implementation of sustainable transport measures which are again enthusiastically supported by Moda Living. We agree that the railway line has created a barrier to movement and welcome the initiatives included with the draft SPD which seek to enhance pedestrian and cycle movement north-south across the railway line whilst highlighting the importance of Hove Station. In this context, the potential to create a new pedestrian/cycle crossing as illustrated at Figure 4.1 (Page 25) of the draft SPD is enthusiastically welcomed by Moda Living and we actively encourage B&HCC, alongside other key stakeholders including Network Rail and the local enterprise partnership (Coast 2</p>	<p>Noted. Support welcomed.</p>

You said	We responded
<p>Capital), to continue to progress this new crossing initiative over the coming months. (Moda Living)</p>	
<p>NR are working with the local Council and local stakeholders who are advocating for a bridge to be installed to improve access from the North of the station. This scheme is unfunded at this stage and would be difficult to design without affecting the car park and maintenance access. However, NR are open to further communications about this including funding options. (Network Rail)</p>	<p>Noted. BHCC will continue to work with Network Rail to pursue this objective.</p>
<p>- Street types and spaces</p>	
<p>Secure cycle storage and cycle stands, for daytime use, need to be urgently provided. The lack of secure cycle storage across the city is a major barrier to cycling, not only for people in flats, but also for those in small houses. (Bricycles)</p>	<p>Noted. The provision of cycling infrastructure is a central element of the draft SPD.</p>
<p>Secure cycle parking should be provided. There is the private cycle store there next to the station, this could also be used for long term cycle parking. Similarly all roads should have access to secure, weatherproof cycle storage. (Brighton Active Travel)</p>	
<p>There needs to be a continuous network of cycle lanes to outside of this area i.e. going east, south and west to Sackville. The lanes have to connect not stop at the edges. (Brighton Active Travel)</p>	
<p>Any pedestrian and seating areas and areas around new housing should be designed in such a way as to improve safety, minimise crime and anti- social behaviour etc. i.e. no enclosed</p>	<p>Noted. Safe and secure streets and spaces are central elements that are promoted by the draft SPD.</p>

You said	We responded
<p>spaces, no dark walkways or corners. This area around Ellen Street currently attracts an element of antisocial behaviour and drugs. (Brighton Active Travel)</p>	
<p>We read in the draft Hove Station SPD that the public realm strategy proposes two distinct street types i.e. “Vehicular routes” where “Cyclists are accommodated on-street.” and “Pedestrian / cycle priority routes”. We strongly support street design that ensures that people are able to cycle or walk safely, whatever the category, and we await any specific proposals. The A270 Old Shoreham Road is categorised in the draft SPD as a vehicular route, but it is currently the focus of a consultation about a permanent cycle facility funded as part of EATF Tranche 2. (Cycling UK)</p>	<p>Noted. Support welcomed.</p>
<p>Sport England welcomes the emphasis within the SPD on improving the pedestrian and cycling environment, and permeability for these users throughout the SPD area and beyond. Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the planning process for new developments and improved public realm within the SPD area. (Sport England)</p>	<p>Noted. Support welcomed.</p>
<p>- New and improved areas of public space</p>	

You said	We responded
<p>We appreciate that certain aspects of society and planning have moved forward, more so recently with the implications of the Covid infections. However, if anything these would tend to point towards less vehicular use in the future. The current Leadership appears to be heading towards a car free Brighton City centre and it would seem very short sighted to not include this in the Hove central area redevelopment. There is the rare opportunity to create a car free bubble here. (Matsim Properties Ltd)</p>	<p>Noted. The draft SPD promotes a pedestrian and cycle-focused environment within the area it covers.</p>
<p>- Sustainability principles</p>	
<p>There is huge scope for planting across the neighbourhood. Care must be taken for this to be designed in from the start, not added as an afterthought. Incentives could be considered to prevent homeowners from concreting over front gardens. (Bricycles)</p>	
<p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this. (Natural England)</p>	
<p>Biodiversity enhancement - This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which</p>	<p>Noted. The draft SPD promotes a range of sustainable measures including planting and greening and a sustainable drainage system (SuDS) within the area. Future development proposal will also need to address the wide range of sustainability policies and concerns as set out in other</p>

You said	We responded
<p>advises (amongst other matters) a ratio of one nest/roost box per residential unit. (Natural England)</p>	<p>relevant documentation – including national guidance, the City Plan, the Neighbourhood Plan and SPDs.</p>
<p>Landscape enhancement - The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die. (Natural England)</p>	
<p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180). (Natural England)</p>	
<p>Strategic Environmental Assessment/Habitats Regulations Assessment - A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project.</p>	

You said	We responded
<p>If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. (Natural England)</p>	<p>Please see response above.</p>
<p>Layout principles</p>	
<p>Para 4.8 The second sentence is illiterate: <i>“Taller buildings help and landmark /way finding point reinforce the important destination of the station (though the station is on the edge of the cluster and, with its heritage status, should not be overcrowded).”</i> It makes no sense whatsoever. Planning policy guidance must above all else, be clear. (Brighton Society)</p>	<p>Noted.</p> <p>Recommendation Edit sentence to read:</p> <p><i>“Taller buildings can collectively create a landmark, helping to waymark and visually reinforce the important destination of the station within the new station quarter and the wider area. A tall buildings ‘cluster’ in this area would need to be carefully planned and considered – particularly with regard to its relative proximity to (and setting of) the nearby station building - and its heritage status.</i></p>
<p>Para 4.12 These proposals and the massing illustrations accompanying Fig 4.12 are frankly horrific. What depressing images, particularly given that developers will use this guidance to push the boundaries even higher. It is a travesty. Where are the green open spaces such dense developments need, the play areas, the landscaped areas, the sunlit spaces to just sit outside and enjoy the birdsong? Has the Council not learned anything from the pandemic and does it not appreciate how essential it is that people living in high-rise apartments can get outside and enjoy generous open spaces. Frankly these proposals look to have been inspired more by Stalinist socialist accommodation blocks than anything which relates to the high density</p>	<p>Concerns regarding taller buildings are noted. The principle of taller buildings in the Conway Street Industrial Area has been long-established in a range of planning policy documents and this principle is consolidated in the City Plan Part 1.</p> <p>The massing illustrations in the draft SPD are intended to act as an indication regarding potential location, height and massing of potential tall buildings – as appropriate to the status of the document. They should not be taken as a literal depiction of the appearance of future buildings. Detailed</p>

You said	We responded
<p>low-rise terraced villas which have been traditionally the type of housing most appropriate to Hove and the wider city. (Brighton Society)</p>	<p>design work will come further down the line at the development proposal stage. This will involve a range of studies required under existing planning policies to test a range of impacts and ensure high quality designs. Such factors will be fundamental requirements as part of any specific future development proposals.</p>
<p>When permitting taller buildings, it is important that long shadow and “wind tunnel” effects are avoided so that people walking and cycling at ground level are not going through dark, windy streets. Lack of sun also means that hazardous icy patches last longer. (Cycling UK)</p>	<p>Noted. BHCC’s wider planning policies require detailed assessment to accompany any proposals for tall buildings.</p>
<p>Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which Gatwick Airport is one. Aerodrome safeguarding considerations cover a wide range of issues, however in the Brighton & Hove City Council area our concerns will relate only to building & structure heights and how they might impact our Instrument Flight Procedures (IFPs). We would ask that going forward any buildings/structures over 200m AOD (Above Ordnance Datum) in the area covered by the Hove Station Area SPD be referred to us for assessment. (Gatwick Airport Ltd)</p>	<p>Noted.</p>
<p>The Master Plan treatment of housing provision is limited to the massing of mixed-use buildings which will include housing units, there is no indicative target for the volume of housing units to be provided. In particular, although there is support for the continued regeneration off the Ellen Clarendon Estate, there is no reference to the NP policy of securing the provision of genuinely affordable social rented housing to offset continuing losses from the ‘right to buy’ (Hove Station Neighbourhood Forum)</p>	<p>The City Plan (Parts 1 and 2) and – when ‘made’, the Hove Station Neighbourhood Plan) provide policies on housing numbers, affordable housing provision and employment floorspace targets. These documents provide higher level planning policies to guide development proposals and the planning decision-making process.</p>

You said	We responded
	<p>The draft SPD focusses on urban design issues such as block layouts spaces, public realm, routes, connections building heights etc. In this respect, the document is intended to add value and a further layer of detail to relevant policies in the City Plan and the Neighbourhood Plan. At the same time, the document avoids being over-prescriptive and too detailed on these issues in order to ensure it has a long ‘shelf-life’ in remaining relevant over time with regard to changes in the market, land ownership and a range of other factors.</p> <p>It would be beyond the remit of a supplementary planning document to seek to establish higher-tier planning policy through setting floorspace targets and detailed affordable housing policies.</p>
<p>The associated text within paragraph 4.12 of the draft SPD is supported. This acknowledges the appropriateness of tall buildings to the southwest of the railway station, and encourages changes to the height and massing of buildings to create visual interest and to avoid long ‘walls’ of the same height. The Conran + Partners work (on behalf of Royal Mail) demonstrates how the Royal Mail site can achieve both of these aims. As such, accompanying figure 4.12 of the draft SPD should be amended in order to accommodate the potential for a taller building on the Site as informed by these representations. (Barton Willmore on behalf of Royal Mail)</p>	<p>The draft SPD does not preclude the possibility of a taller building coming forward on the Royal Mail site – but any such proposal would need to be accompanied by appropriate justifications. The draft SPD does identify the potential to cluster tall buildings within the Conway Street Industrial Area, in recognition that this area has already been identified as a tall building node in other planning documents. The existing designation is partly the result of the presence of existing tall buildings in the immediate vicinity (residential towers in the Clarendon Ellen Estate).</p>
<p>We note that the proposed Movement Strategy includes a key pedestrian / cycle priority route from Hove Station, down the steps off Goldstone Villas, along Conway Street and then down Goldstone</p>	

You said	We responded
<p>Street (Figure 4.1). Linked to this, we note that the Key Frontages & Edges Strategy includes key frontages along Conway Street and Goldstone Street and secondary active edges along Ethel Street and Ellen Street (Figure 4.11). The above is inconsistent with the extant permission at 1-3 Ellen Street. Through this permission it was envisaged that the key pedestrian / cycle route would be down the steps off Goldstone Villas, down Ethel Street and then along Ellen Street. The envisaged landscape strategy for the public realm includes an increased level of soft landscaping and street furniture along Ethel Street and Ellen Street compared to Conway Street. The ‘key frontages’ of the development have also been positioned along these streets (rather than Conway Street), with the more back of house uses, vehicle access and servicing creating ‘active frontages’ along Conway Street. An extract of the approved ground floor plan is provided below for ease. The design was discussed in detail with a number of officers at the Council (as mentioned above) as well as key stakeholders during the pre-application process. The final approved development is a product of a collaborative approach. Given the above, it is respectfully requested that the Movement Strategy and Key Frontages & Edges Strategy for the Hove Station Area are amended to better reflect the emerging development at 1-3 Ellen Street. (Savills on behalf of Watkin Jones)</p>	<p>The key frontages diagram can be amended to show elements that are would come forward as part of the planning permission relating to the Watkin Jones proposal.</p> <p>Recommendation Amend the Movement Strategy and Key Frontages & Edges Strategy for the Hove Station Area are amended to better reflect the emerging development at 1-3 Ellen Street.</p>
<p>We note that the proposed Buildings Heights Strategy for the urban block that includes 1-3 Ellen Street and the bus depot car park is partly covered by an ‘Area suitable for heights up to 17 storeys’ and partly by an ‘Area suitable for heights up to 8 storeys’ Again, this is at odds with the extant permission at 1-3 Ellen Street which includes two east-west orientated blocks rising to G+6; and two north-south orientated blocks rising to G+11 & G+17, and G+6 & G+8 respectively.</p>	<p>Noted. Agree that the extant planning permission does set some type of precedent with regard to height on the 1-3 Ellen Street site (although important to note that all tall building proposals need to be justified with regards to a wide range of criteria).</p>

You said	We responded
<p>Through the granting of the extant permission at the site the Council has confirmed that up to 18 storeys in this location is acceptable in principle. It is therefore respectfully requested that the two areas covering the urban block be amended to ‘up to 18 storeys’ and up to 9 storeys’ respectfully to reflect the emerging development. (Savills on behalf of Watkin Jones)</p>	<p>Recommendation Amend the two areas covering the urban block located at 1-3 Ellen Street to ‘up to 18 storeys’ and up to 9 storeys’ respectfully to reflect the emerging development</p>
<p>Internal comments raised by BHCC’s Culture, Tourism and Sport team highlight the need for new workspace for creatives in the city. Artists and makers are part of the city’s important Creative, Digital and IT (CDIT) sector - which accounts for around 20% of the city’s economy. New mixed-use development within the draft SPD area should be providing for employment floorspace (as set out in City Plan policy DA6) – so there is a potential role for such floorspace to help meet the requirements of the city’s CDIT sector.</p>	<p>While it would not be appropriate for the draft SPD to detail the types of B1 floorspace (as sought in the City Plan policy DA6) that should come forward in the area, it can usefully highlight that B1 floorspace designed towards meeting the needs of CDIT-type end users could play an important role in contributing towards the SPD’s objectives to secure active frontages in the area.</p> <p>Recommendation Add further text (as underlined below) to para 4.10 reflecting need for additional supply of floorspace for creative industries in the city – and the role that such floorspace could play in contributing to active frontages as sought in the SPD.</p> <p>Mix of uses 4.10 The Council’s planning policy aims to regenerate the area as a vibrant and sustainable mixed-use area. Policy DA6 requires the retention or replacement of existing employment floorspace with a shift towards high quality flexible office / business (B1) uses. In order to secure an appropriate mix of uses, new development in the area should incorporate a range and mix of uses at ground floor level, with housing units above, that can contribute positively to active edges along the</p>

You said	We responded																					
	<p>streets and spaces. <u>Floorspace for Creative, Digital and IT Industries could play a key role here, not just in meeting demand for such workspace throughout the city from this locally-important economic sector, but in providing active frontage opportunities at the lower level of new buildings, to help animate the public realm and contribute to the safety and security of the area.</u></p>																					
<p>5. Site specific opportunities</p>																						
<p>Broad response to ‘site-specific opportunities’ (received via consultation portal)</p> <table border="1" data-bbox="203 715 1171 986"> <thead> <tr> <th></th> <th>Total responses</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Very positive</td> <td>19</td> <td>59.5</td> </tr> <tr> <td>Positive</td> <td>9</td> <td>28</td> </tr> <tr> <td>Neutral</td> <td>0</td> <td>0</td> </tr> <tr> <td>Negative</td> <td>2</td> <td>6.25</td> </tr> <tr> <td>Very negative</td> <td>2</td> <td>6.25</td> </tr> <tr> <td>TOTAL responses</td> <td>32</td> <td>100</td> </tr> </tbody> </table>		Total responses	%	Very positive	19	59.5	Positive	9	28	Neutral	0	0	Negative	2	6.25	Very negative	2	6.25	TOTAL responses	32	100	<p>Overall positive response welcomed.</p>
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<p>The amount of parking you're planning to get rid of should be doubled though. Every time you're planning to get rid of parking, double it. The council is killing citizens every day you don't take drastic measures against car dependency and air pollution.</p>	<p>Noted.</p>																					
<p>It would be great to see a lift and stairs for pedestrians to cross over the railway at Hove station - it's a long way round in either direction if you are in a wheelchair. There is a lift inside the station to go under the railway but you have to be a ticket holder to use it.</p>	<p>Noted. Support welcomed.</p>																					

You said	We responded
Too many people in an overcrowded space	Noted.
Particularly agree with the principal of improving pedestrian and cycle facilities and reducing the dominance of cars. Also creating increased green spaces and especially planting of trees which seem to be on the decline in Hove with the loss of many old and diseased trees.	Noted. Support welcomed.
Very positive, although would like to make sure there is still a convenient area to pick up and drop off at the station	Noted – support welcomed. Providing convenient pick-up and dropping off area for the station will be a requirement of Network Rail and the train operating company in respect to any changes proposed to the station.
Pedestrian (and bicycle - I think access should allow for bicycles to be pushed) link over the area is vitally needed - it is a travesty that there is no accessible access across the railway line here and really impacts on usability for many people. A pocket park (and perhaps other smaller 'microparks') would also be crucial to the outdoor environment being somewhere that people want to spend time as well as improving air quality and aesthetics, and offering the opportunity for more active lifestyles. I think the canopy of the station detracts currently. New pedestrian (and bicycle?) access to Conway Street would also be positive. I have some fondness for the Honeycroft as it is and would prefer a redesign/additions to a full rebuild - although the rear of the building is dark and difficult to navigate, the main frontage to the courtyard has a striking appearance and seems to me to be of architectural value.	<p>Noted.</p> <p>The station canopy forms part of the wider listing (Grade II*) of this building.</p> <p>The details of any future potential project involving the Honeycroft Centre and new housing would need to be carefully considered by BHCC and be subject to further stakeholder consultation with the relevant parties (in particular local residents of the Clarendon Ellen Estate and the occupier of the Honeycroft Centre)</p>

You said	We responded
<ol style="list-style-type: none"> 1. The Bus station removal is critical to everything else. Where will the bus depot be relocated? It should not be in this area, or at least, not rammed up against high density residential blocks. 2. The station forecourt needs proper handling. There must be space for plenty of "dropping" off for travellers, from cars and buses. The present arrangements are poor; and so are those in the execrable Brighton station. Many of us will use cars into the 2030s, and we need a place to wait a few minutes to collect passengers from the train. We need this because the trains are so unreliable and delayed frequently, that precise timing is often impossible. Please do make allowance for these needs. 3. Transport is for everyone, not just the cyclists and bus users. 4. You need to manage the vandalism/graffiti/filth/rubbish accumulations in this area much better. It is foul. The railway tunnel is dangerous. What street security/vigilance is planned to stop this? 	<p>The bus company has advised that Conway Street will remain a key location in their future plans to run and expand bus services across the city. Design issues will need to be carefully considered and developed in tandem with site assembly/land transactions in order to ensure a development solution that meets the operational requirements of the bus company, while delivering a sustainable urban quarter in line with planning policy objectives. BHCC will work with the bus company and other stakeholders to secure these outcomes. Similarly, it will work with Network Rail and the relevant train operating company to ensure that any development and reconfiguration within and around the train station meet operational and passenger needs.</p> <p>The draft SPD sets out a range of objectives for a safe and secure area. While good design can play a key role in helping achieve this, there is also a role to be played by other services (waste collection, street cleansing, policing etc) that are outside the remit of a supplementary planning document.</p>
<p>Can't wait for the ugly bus depot to go</p>	<p>Noted.</p>
<p>Car use is always underestimated as with every other development a problem will be created that will never be fixed. Don't try to squeeze so many residents into a small area without appropriate infrastructure</p>	<p>Future development proposals within the draft SPD area will be expected to contribute towards the wider infrastructure to the area, as commensurate with the nature of the specific proposal and with regard to the objectives set out in the SPD and other relevant planning documents.</p>
<p>These are all good plans.</p>	<p>Noted. Support welcomed.</p>

You said	We responded
<p>Again, our main interest is anything related to station buildings and land and we remain positive to the proposals to date.</p>	<p>Noted. Support welcomed.</p>
<p>Support pocket park proposal but further green/social spaces required throughout development area. No 'closed' spaces only accessible to private residents. No 'poor doors'.</p>	<p>Noted. In addition to the pocket park the draft SPD sets out a strategy for a high quality public realm, greening and people-focussed public spaces.</p>
<p>See previous comment about a "green corridor" - how amazing it would be to strategically link B&H parks with vehicle free pedestrian/bike routes.</p>	<p>Noted. This is an interesting concept proposal and appropriate references can be added to the document.</p> <p>Recommendation Include additional text and diagram amendments to include an objective to secure a green link to Hove Park.</p>
<p>Although I actually agree with most of the proposals I am very concerned about the Fonthill Road proposal. Reducing it to single carriageway under the tunnel and putting in a priority filter would, no doubt, slow the traffic there. But the plan itself refers several times to this route being used as a 'rat run' and if you block/significantly slow down this route the rats/traffic will find another route. In particular I think traffic coming south from Old Shoreham Road would just turn off before getting to the tunnel, using Ranelagh Villas, Hartington Villas or Newton Road as a new rat run. These are residential roads. They are outside the DA6 developmental area covered by this SPD, but potentially very significantly affected by it. Before any changes are made there should be a traffic assessment for the whole wider area, not just DA6.</p> <p>I also have some concerns about Hove station proposal. A car-free approach and forecourt is fine for able-bodied people, but it is important to have disabled parking and pick-up/drop-off close enough</p>	<p>Noted. The proposals for Fonthill Road are a desired outcome but will present a challenge in order to ensure a solution that works for both the new urban quarter and surrounding neighbourhoods. Detailed design work and traffic modelling will be required in developing future plans for Fonthill Road.</p> <p>BHCC will work with the bus company and other stakeholders to secure these outcomes. Similarly, it will work with Network Rail and the relevant train operating company to ensure that</p>

You said	We responded
<p>for people who can't easily walk (the elderly as well as the disabled). Not like Brighton Station where it is a long walk to both pick-up/drop-off point and taxis.</p>	<p>any development and reconfiguration within and around the train station meet operational and passenger needs.</p>
<p>I like some of these ideas, would be great to have a pocket park. Am pleased the bus depot will remain, they are an important employer and them using this land will mean less flats and so less people squeezed in to this small space (and wouldn't it be amazing if the new homes were priced so their staff could live locally and so did not have to drive in). They can create noise though, and serve a 24hr city, so this must be taken into account with the layout of residential and business units. With the public transport links it is fair to expect a reduction in car use. Would be good for Ethel Street to have a pavement on both sides.</p>	<p>Noted. Support welcomed.</p> <p>Streets within the area will be expected to place pedestrians and cyclist' needs above cars – although the design details would need to be carefully worked-out as a separate exercise.</p>
<p>Station Rise</p>	
<p>We are not clear on the benefits of moving the existing car park to behind Conway Street, at present it is contained next to the station which is not a residential area. It will not be so convenient for commuters. Consideration must be given to the needs of disabled people and access to the station There should be step free access to the station if the car park is moved; currently there is only stepped access next to the pub. The idea of car park also being for the use of residents is good. If cycle lanes are added this will reduce resident parking so a resident parking area for an annual fee would be good. (Brighton Active Travel)</p>	<p>Any multi-storey car park would need to meet a wide range of access needs. Lifts would be a definite requirement in this respect.</p>

You said	We responded
<p>Para 5.2 – we welcome the broadened thinking around this area and agree that this provides a major opportunity, including a better setting for the station with a removal of the current car parking from the immediate vicinity of the station area. The section also includes some interesting suggestions for replacement of and additional parking. (Hove Civic Society)</p>	<p>Support welcomed.</p>
<p>In one key respect the draft SPD goes much further than the NP. Its proposals for the combined mixed-use redevelopment of the Network Rail car park and the eastern bus depot, in a very high-density mixed-use project it names as Station Rise, will involve the eventual provision of a new bus station on land to the west of Fonthill Road/Goldstone Street, jointly owned by the council and Matsim. It is proposed that the occupants of the new housing will not be allowed car parking permits, in line with NP policy. But the replacement car parking for rail users is proposed on the ground floor in Conway Street which will therefore draw vehicular traffic into the area. This both contradicts NP policy which suggests a replacement car park within the industrial area at the Fonthill Road end of Newtown Road. (Hove Station Neighbourhood Forum)</p>	<p>BHCC will need to work collaboratively with a range of stakeholders. As well as the HSNF, local residents and land owners – Network Rail and Brighton & Hove are key partners with regard to securing implementation of the objectives and proposals set out in the draft SPD. The draft SPD does not preclude the replacement car park from being relocated to the north of the railway (if this is achievable) – and the SPD can be modified to incorporate this concept as a preferred alternative. BHCC will raise this possibility in its ongoing dialogue with Network Rail.</p> <p>Recommendation</p> <p>Add reference to exploring potential of site north of railway for replacement station car park.</p>
<p>NR wish to make the Council aware that Go Ahead Group have made enquiries with NR to purchase land between the existing Conway St bus depot and the station car park to expand and enhance the existing bus depot. This would somewhat conflict with the strategic allocation to turn this into a residential high rise. (Network Rail)</p>	<p>Noted. BHCC is having ongoing dialogue with Network Rail and Brighton & Hove Bus Company with regard to working co-operatively towards securing masterplan objectives within a strategy that accommodates the operational needs of these key transport providers.</p>

You said	We responded
<p>Honeycroft Centre Area</p> <p>The Draft SPD includes proposals for the locations which the Neighbourhood Plan has identified as Community Hubs, envisaged as key building blocks of the identity of the new Hove Station Quarter</p> <ul style="list-style-type: none"> • NP Community Hub 2 Sackville Road-Conway Street is renamed in the draft SPD as the Honeycroft Centre Area: a redevelopment scheme is proposed for the whole block, whereas the NP proposal is for a phased approach delivering first the refurbishment of the Honeycroft buildings and their immediate environment, followed by the redevelopment of the adjacent Decon site, which would generate developer funds that could contribute to the eventual redevelopment of the Honeycroft buildings. <p style="text-align: right;">(Hove Station Neighbourhood Forum)</p>	<p>Noted. The details around future implementation of development proposals within both the Neighbourhood Plan and the draft SPD will depend on a variety of factors around the nature of land deals, developers, BHCC engagement with local residents etc – and will evolve over time. The draft SPD’s implementation proposals are not hard and fast rules regarding phasing etc, as it is recognised that planning documents require sufficient flexibility to maintain relevance in the longer term, while providing sufficient guidance to be able to act as useful tools in securing the objectives they set out to achieve.</p>
<p>Station Approach</p> <p>The car-free station forecourt is important, both aesthetically, and to promote the use of active travel and public transport. (Bricycles)</p>	<p>Noted</p>
<p>We agree with the major public realm improvements to the area immediately in front of the station buildings and their surroundings. From the master plan, this would include:</p> <ul style="list-style-type: none"> - a car-free forecourt - moving the taxi rank to a more convenient location for station users - moving the bus stop to a more convenient location for station users 	<p>Noted.</p>

You said	We responded
<p>We are very much in favour of a north south footbridge over the railway line that would allow access for pedestrians, wheel-chair users and cyclists. (Brighton Active Travel)</p>	
<p>Para 5.4 Station Approach. We fully support the aim of improving this admittedly unsatisfactory station approach area. But there are no teeth! In order to achieve the aim of improving this area the carwash and filling station must go. This has to be a key requirement of the SPD. After all, the scale of development proposed for the area to the west of the station, if realised would generate enormous profits for the developers. Where is the benefit to the local community if a proportion of those profits doesn't contribute to the essential improvements to the public realm? The expression "<i>could be brokered</i>" (line 10 of Site Parameters) is a completely inadequate response to dealing with this essential requirement. They are fine sounding words intended to reassure the public that the benefits of the Masterplan justify the massive buildings proposed to the west of the Station. But there are no guarantees that the benefits will happen – the only guarantee is that under the Hove Station Masterplan as currently drafted, these huge out of scale buildings will tower over and dominate the Hove Station area listed buildings and the Conservation Area. (Brighton Society)</p>	<p>Implementing many of the proposals in the draft SPD will necessitate maintaining working relationships, dialogue and seeking jointly agreed outcomes with a range of stakeholders in the area – in particular key landowners. The forecourt in front of the station is within the ownership of Network Rail (NR) with who BHCC is in dialogue re. working towards securing the key objectives in the document. Any issues around current lease agreements on NR property will necessitate NR's active and willing co-operation. This is recognised in the text of the draft SPD.</p>
<p>Fig.5.12 is so badly drawn as to be virtually indecipherable. It is unclear how the station car park car access from the north side of Conway Street will work, given that it is several metres below the level of the Station forecourt on Goldstone Villas. It appears to show access from Conway Street at a lower level and from an undefined footpath at the upper (station) level. It can't do both. It also seems to contradict Fig 5.6 which shows "active ground floor frontages" on to the north side of Conway Street with "employment and café/retail uses". Again - it can't</p>	<p>Illustrations in the draft SPD are intended to illustrate concepts, without overly-suggesting design details. The draft SPD uses a mixture of illustrative material, diagrams and text in order to convey information with regard to its proposals. When developers and/or development partners come on board, further illustrative material would be expected to be developed and have increasing clarity with regard to detail – but at this point in time the proposals are conceptual and the</p>

You said	We responded
<p>be that and be a car park at the same time. It looks to us as though this policy document has been hurriedly thrown together resulting in a total lack of clarity or consistency. In its present form it wouldn't stand up to any serious legal challenge. (Brighton Society)</p>	<p>illustrations are deliberately 'light' on clarity (but do benefit from accompanying text).</p>
<p>The bridge to the right of the station entrance at the top of Goldstone Villas with its steep steps is a barrier to people crossing the line whether they have a cycle or not. There needs to be a bridge with a ramped approach for people to walk and cycling across. Previous attempts to improve the cycle-friendliness by minor measures e.g. adding a gutter to the side of the steps are not enough. (Cycling UK)</p>	<p>Noted. In communicating to and working with Network Rail BHCC will be seeking an outcome whereby any new and/or improved bridge facilities meet the widest possible range of user and mobility needs, within any physical or other limitations posed by the site in question.</p>
<p>The Draft SPD includes proposals for the locations which the Neighbourhood Plan has identified as Community Hubs, envisaged as key building blocks of the identity of the new Hove Station Quarter</p> <ul style="list-style-type: none"> • NP Community Hub 1 Hove Station: illustrative design schemes are provided in the Draft SPD for the Hove Park Villas Square and Station Approach parts of the hub, north and south of the footbridge - these enhance the illustrative design schemes included in the submitted Regulation 16 Draft Neighbourhood Plan Part 2 <p>(Hove Station Neighbourhood Forum)</p>	<p>Noted</p>
<p>Our key interest is in the station itself and any areas of Network Rail land – basically any improvements to the listed station building and footbridge are our key focus. In principle, we're happy with the proposal to date and would like to be included in any future correspondence, documentation or meetings, so that we can comment further when we see more detail. (Railway Heritage Trust)</p>	<p>Noted. Support welcomed.</p>

You said	We responded
<p>Fonthill Road and Goldstone Road</p>	
<p>No solution offered up for heavy traffic flows on Sackville Road, which will be exacerbated through limiting access on Fonthill Road. No traffic flow information has been shown to evidence that Fonthill Road is used as a rat run. Access to Fonthill Road will continue to be required for access to station, medical centre, local shops etc. ()</p>	<p>Any detailed proposals to implement the objectives for Fonthill Road would be subject to a detailed assessment with regard to mitigating any potential impacts from traffic in the wider area.</p>
<p>The design of the tunnel on Fonthill Road is important. It must be brightly-lit and attractive in order to maximise use by pedestrians and cyclists. Inside the tunnel, cyclists need to be kept physically separate from motor vehicles and pedestrians using protected cycle lanes. (Bricycles)</p>	
<p>We need a robust, segregated cycle lane in both directions in Fonthill Road and Goldstone Street in order to improve the existing north-south link running along these streets (including the section running under the railway). We also need wide pavements. Traffic should be an enforced 20 mph.(Brighton Active Travel)</p>	<p>Details regarding the type and degree of traffic segregation within the tunnel would need to be carefully considered at the design stage.</p>
<p>We can't help feeling that the proposal to narrow the carriageway to a single lane will just make a bad situation even worse. Traffic will back up in both directions adding to the existing air pollution problems in the tunnel. The text says: <i>"The objective will be to create a key movement corridor, with reduced vehicular movement."</i> Quite. Another contradiction in terms. Fig.5.20, like the preceding diagrams is virtually indecipherable. The writer spent 45 years as an architect and can't understand the information that it purports to convey. (Brighton Society)</p>	<p>Any detailed proposals to implement the objectives for Fonthill Road would be subject to a detailed assessment with regard to mitigating any potential impacts from traffic in the wider area.</p> <p>Illustrative material has been prepared with regard to illustrating broad concepts and should be considered alongside accompanying text for a full understanding.</p>

You said	We responded
<p>Fonthill Road provides a useful way to cross under the railway line, and riders from the north or the east of the site often continue along Ellen Street (or Conway Street) and cross Sackville Road to quieter streets e.g..Montgomery Street and Stoneham Road and points further west or south. But the traffic speed on Fonthill Road is too high. It needs to be lower and enforced. We agree that this is part of a rat run. This,combined with the dark tunnel and uneven road surface is a deterrent for cycling and walking. We agree that fast moving vehicles make the environment hostile for pedestrians and cyclists. (Cycling UK)</p>	<p>Noted. Support welcome.</p>
<p>With the huge increase in new homes planned for the Hove Station SPD area, the new development needs to be sustainable and meet the sustainable development objectives contained in the National Planning Policy Framework. The small Pocket Park is woefully insufficient and additional green space needs to be provided for the residents of the Hove Station SPD area. It is vital that meaningful green spaces are provided for the local resident’s recreation and very close by. ()</p>	<p>While the pocket park is identified as the principal public open space opportunity within the core masterplan area, it should be noted that the draft SPD promotes streets and spaces that are pedestrian focussed – and identifies other opportunities for open space including upgrading the existing area in front of the Honeycroft Area (which is a fairly significant but unattractive space with little current amenity value). Green infrastructure, a high quality public realm and a focus on pedestrian and cycle movements and connectivity are all elements of this overall approach. The location of the core masterplan area is inherently sustainable with regard to its proximity not only to the public transport network, but also to some key open spaces in the city, with Hove Park, the seafront and a range of other public open spaces within close walking distance.</p>
<p>We strongly support providing a pocket park in the heart of the area, to the south of the Fonthill Road tunnel. Consideration should be given to its siting; if it is directly opposite the car park will it be safe for children? It will also increase noise and pollution. (Brighton Active Travel)</p>	<p>Safety issues would need to be carefully considered in any detailed design work that is undertaken in respect of the pocket park and other public spaces within the core masterplan area.</p>

You said	We responded
<p>You will know that we are working pro-actively with the Council to progress our investment into Hove Bus Garage, and will continue to do so. The draft SPD indicates the land as ‘focal green space’ (or pocket park on section 5) on figure 4.1 and 4.11 would be sited on our land. We suggest that the principle of additional open space is maintained but the specific reference to our land is removed. The open space could in fact go elsewhere, for example on the opposite side of Fonthill Road. (Brighton & Hove Bus Company)</p>	<p>The location of the ‘pocket park’ has been identified as having best potential for success on the axis of the north-south and east-west corridors through the area. It is, however, appreciated that the end-location of the pocket park will be subject to a range of discussions aimed at reconciling the various land use needs in the area. This is already acknowledged in the draft SPD. On this basis, it may be helpful to indicate a wider area for the potential location of the pocket park within and on the edge of this movement access. It has been noted that the site referenced by Brighton & Hove Bus Co has recently been sold by them to Watkin Jones, the owner of 1-3 Ellen Street.</p> <p>Recommendation Amend diagram of pocket park to show a wider potential area within it might be located – but emphasise that its location should be visible from and in very close proximity to this crossing point.</p>
<p>This area is so small as to be insignificant. How many flats in the adjacent tall buildings will it be designed to serve? It has to perform a wide variety of roles In the context of “<i>very high density development</i>”. According to the masterplan proposals: It will be an “<i>important green space</i>”; It has “<i>a key role to play as part of the pedestrian-friendly east-west route across the area</i>”; It will “<i>provide one-way access to the parking serving Industrial House and the Agora building</i>”; It will “<i>have the potential to incorporate informal play opportunities or a small children’s play area</i>”; It will “<i>enhance biodiversity... promote learning (eg bug hotels)...and shared community food growing space.</i>” All this</p>	<p>Noted. The pocket park is intended to be one of a series of amenity spaces within the core masterplan area. Along these – and with the overall greening of the area and other sustainability measures such as SuDS, green streets etc – it will play an important amenity role within the area. As noted above, the area is located in close proximity to a range of significant public spaces in the city (Hove Park, the seafront etc) – and these will also play an important role in providing for recreational needs.</p>

You said	We responded
<p>and “it will provide a unique and engaging space for people to move through and linger...” If it comes anywhere near doing all of those satisfactorily, it will be a miracle. (Brighton Society)</p>	
<p>The Draft SPD acknowledges the NP proposals for pocket park provision – it suggests the site immediately adjacent to the Hove Gardens project, but acknowledges the potential of the NP alternative of a small pocket park at each end of Conway Street. (Hove Station Neighbourhood Forum)</p>	<p>Noted.</p>
<p>We feel the proposed site of the Pocket park is poor given there is an ideal opportunity to make use of the available land between Hove Gardens and the rear of Goldstone Villas. A public area on this land could link neatly through to further public realm on (a removed) Conway Street to the north of Hove Gardens. This could create a very central significant car free area adjacent to the Station. There is the possibility to create vehicular access to the Station car park from Goldstone Street over Network Rail land, to the north of the current Bus Depot. (Matsim Properties Ltd)</p>	<p>The potential site identified for the pocket park is on the principal axis of north-south and east-west pedestrian movements within the core masterplan are – and as such has been carefully considered in terms of its ideal location with regard to pedestrian and cycle movements. The draft SPD acknowledges that this is not the only potential location – and there is sufficient flexibility within the document for alternatives to come forward.</p>
<p>Notwithstanding the clear intent to redevelopment the bus depot car park site for new buildings, we question the deliverability of a pocket park in this location. Whilst some of the proposed park falls on highways land, the majority of the land is under private ownership. There is no commentary within the SPD on how the Council will secure this land, who will pay for the land or the park, or who will deliver it. Viability is a central part of this issue. The land is currently used by the bus company for operational parking and this would need to be relocated elsewhere as part of any scheme to use the land for a different purpose. That process would likely be part of a wider</p>	<p>Please see above responses relating to comments on the pocket park. The draft SPD provides flexibility for the location of this amenity proposal – and also flexibility regarding the location of other important land uses (such as the relocation of the bus depot). It is recognised that implementation of the objectives set out in the document will require land deals and associated negotiations. Notwithstanding the above, it is considered important for the document to set out its preferred location for the pocket park and - as referenced above – the</p>

You said	We responded
<p>rationalisation of the bus company’s assets in this area which would need value to be generated to fund any redevelopment and / or relocation. The use of the land as open space is unlikely to generate significant value to assist the process and this issue is not addressed in the SPD. It is also worth noting that the SPD itself acknowledges that alternative locations for a pocket park within the area should be considered, such as at the corner of Conway Street and Ethel Street as suggested in the latest version of the draft Hove Station Neighbourhood Plan. Within this draft Plan there is no reference to a pocket park on the bus depot car park site. Furthermore, the site is less than a 10 minute walk from Hove Park which is a substantial city-wide asset. This provides significant formal and informal recreation opportunities within easy reach which readily serves the local population in the surrounding area. This will be complimented by further opportunities within Moda Living’s development at Sackville Trading Estate (LPA Ref. BH2019/03548) and the development at the Kap site (LPA Ref. BH2018/03356) which together include a number of high quality public spaces. Given all of the above, it is respectfully requested that the proposals for a pocket park on the bus depot car park site be removed from the SPD and instead the site be identified for redevelopment including new buildings. (Savills on behalf of Watkin Jones)</p>	<p>axis-point of principal north-south/east-west pedestrian and cycle movements is considered its optimum location (from an urban design and useability perspective).</p>
<p>Ellen Street We would also like to see vastly expanded tree cover in the whole of the area. Trees play a key role in reducing CO2. They also make</p>	<p>Noted</p>

You said	We responded
streets more attractive to live in and walk through. (Brighton Active Travel)	
<p>Para 5.7 Ellen Street - It is totally unclear from this paragraph what a development proposal providing an “active frontage” might consist of. Presumably it would be housing – but how would this relate to the tall Council housing blocks between Ellen Street and Clarendon Road, how high would it be, how many dwellings could it accommodate? Would or should any parking be provided, would it be private or Council funded, would there be an affordable housing component? Surely studies would have looked at providing answers to these questions. If not, this just appears to be window dressing to disguise the bleak reality of the high-rise blocks proposed (Brighton Society)</p>	<p>It should not be assumed that housing alone would be providing the “active frontage” element in new developments. It is important to note that the Conway Street Industrial Area (which equates to the “Core Masterplan Area” in the draft SPD) is identified in the City Plan Part 1 for mixed use employment-led development (with an expectation that the minimum provision of replacement employment floorspace will not be less than the existing level of employment floorspace in the area). Appropriately designed blocks have the potential to accommodate employment uses (with active frontages) on the ground floor – e.g. workshops, offices etc, with residential uses on upper floors.</p>
Ethel Street	
We fully support the reduction of parking on Ethel Street, and across the area in general. (Bricycles)	Noted. Support welcomed.
We support reducing the dominance of parked vehicles in Ethel Street. We agree that this will help provide a high-quality public realm that will attract people and benefit existing and future businesses. (Brighton Active Travel)	Noted. Support welcomed.
If ever a street needed upgrading it is Ethel Street. Whether more parking areas under a few more trees will attract <i>“more people into using an area to spend time (and money)”</i> remains to be seen,	The proposal is to reduce (not increase) the level of existing parking in Ethel Street, in order to provide a more pleasant environment.

You said	We responded
<p>particularly as it will be overshadowed by the building proposed for 1-3 Ellen Street. (Brighton Society)</p>	
<p>The steep steps in Goldstone Villas going down to Ethel Street are also a barrier for cycling and walking. Ramps with a low gradient are needed instead, as part of the possible new development or otherwise. (Cycling UK)</p>	<p>Noted. The proposals for ‘Station Rise’ are envisaged to be key elements in terms of providing improved access for pedestrians and cyclists into the area. The steps between Goldstone Villas and Ethel Street would remain as an access point, but there is probably little physical scope to significantly improve them with regards to gradient and ramps.</p>
<p>Hove Park Villas Square</p>	
<p>We agree about the importance of improving the environment and public realm of Hove Villas, to provide a public space for people and an improved pedestrian bridge link across the railway that meets the mobility needs of all. (Brighton Active Travel)</p>	<p>Noted. Support welcomed.</p>
<p>A new square is a nice idea, as is improved access to the footbridge for disabled users – but bearing in mind the footbridge is listed, any measures would have to be very sensitively carried out. Would the Council contribute to the funding to ensure this? The new square would need to accept some vehicular traffic. Access to and egress from the narrow road to the south of the DuBarry building via Fonthill Road only is a non-starter. Is this a serious planning document – in which case it should make realistic proposals - or is this yet another case of window-dressing? (Brighton Society)</p>	<p>BHCC is in an ongoing dialogue with Network Rail regarding implementation of key aspects of the draft SPD – including improvements to the station and the footbridge. Such improvements would most likely form part of a series of development proposals to redevelop the car park and wider area, in accordance with the document’s objectives. Heritage will play an important consideration – but will also need to be balanced against accessibility needs, in order to work towards a solution that addresses both of these issues.</p>
<p>The Draft SPD includes proposals for the locations which the Neighbourhood Plan has identified as Community Hubs, envisaged as key building blocks of the identity of the new Hove Station Quarter</p>	<p>Noted.</p>

You said	We responded
<ul style="list-style-type: none"> • NP Community Hub 1 Hove Station: illustrative design schemes are provided in the Draft SPD for the Hove Park Villas Square and Station Approach parts of the hub, north and south of the footbridge - these enhance the illustrative design schemes included in the submitted Regulation 16 Draft Neighbourhood Plan Part 2 (Hove Station Neighbourhood Forum) 	
6. Phasing and delivery	
<p>The document needs to make sure B&HBC buses can get into the East Garage as they do at present. On page 51, the phasing should be reversed the East Garage as Medium Term and the West Garage as Long Term. (Brighton & Hove Bus Company)</p>	<p>Noted.</p> <p>Recommendation Reverse phasing of bus depot sites to show east garage as long term and the western depot as medium term.</p>
<p>We appreciate that this Masterplan is the first step in tackling the problem of regenerating a scruffy and unloved area of the city. But will the price - as described in this Masterplan document - be worth the effort? If - in an attempt to provide a few more trees and paved areas - the residents of Hove merely exchange one scruffy neighbourhood for another blighted by huge anonymous blocks of flats and sunless streets, they would be quite justified in asking whether it is worth it. Public realm Improvement and low-rise high-density residential streets with good local facilities and access to Hove Station – YES. Sunless streets in the shadow of high-rise blocks of flats - with no guarantees of significant public realm benefits as inadequate compensation – NO. (Brighton Society)</p>	<p>Noted. It is not the intention of the draft SPD to provide anonymous blocks and sunless streets. Future development proposals will be expected to deliver high quality designs and public realm. Considerations regarding sunlight/daylight issues will be carefully scrutinised in the preparation and submission of future development proposals – in accordance with relevant planning policies.</p>
<p>We note from Figure 6.1 of the draft SPD that the Clarks Industrial Estate and Newton Road Employment Area generally are scheduled to form part of the longer-term phasing of the redevelopment of the DA6</p>	<p>Noted. BHCC would be happy to discuss the longer-term regeneration potential of this area.</p>

You said	We responded
<p>area. The table below Figure 6.1 identifies that the Newton Road Employment Area is in multiple ownership, which brings land assembly complications. We are instructed by LaSalle Investment Management (managing the Clarks Estate on behalf of Coal Pension Properties Ltd) to confirm to you that, in principle, it supports the regeneration of the Hove Station Area. In the short term, this should be based upon the “<i>agent of change</i>” principles whereby occupiers of the Estate should retain their ability to operate without being restricted by new development on adjoining land. Notwithstanding this, and whilst LaSalle has invested in the Estate and needs to consider the obligations that it has to its tenants, the company would be happy to discuss the longer-term regeneration of the Newton Road Area with the Council and other landowners for a residential led mix use scheme. (Barton Willmore on behalf of La Salle Investment Management)</p>	
<p>We very much endorse the statements regarding the council’s responsibility and key role (para 6.4 etc) in bringing about the changes necessary. Many of the changes proposed will require more funding than developer contributions and there will be a substantial requirement for public sector funds to help create the attractive Hove Station Quarter referred to. Indeed this document is as much a framework document for the City Council as it is for developers. Without the City Council getting actively involved most of the changes proposed in the SPD will simply not happen. The Society therefore calls for the Council to establish a committed and strong leadership group in partnership with the local community. This group should urgently press ahead with preparing the infrastructure of linkages needed in the area, start transforming the bleak environment of much of the area and press for detailed plans for the immediate station area. As a first priority the council should set in train the preparation of a</p>	<p>Noted. BHCC is in dialogue with key stakeholders to examine implementation issues. Community engagement will form an important element of any implementation strategy that is agreed.</p>

You said	We responded
<p>traffic management scheme for the entire DA6 area to help manage the impact of the new development. (Hove Civic Society)</p>	
<p>Not only does the Draft SPD adopt the Forum vision for the new Hove Station Quarter and support many, if not all, of the NP policies, it also proposes a significant role for the Forum as a partner in the further development and delivery of the Master Plan proposals by</p> <ul style="list-style-type: none"> • acknowledging the prospective partnership working which the Forum has negotiated with MODA and Watkin Jones in the early delivery of the Hove Station Quarter’s two major mixed use ‘build to rent’ projects; and • naming it as a key stakeholder in its Hove Park Villas, Station Approach/footbridge and Honeycroft Centre Projects in the NP Community Hubs <p>In this context it is very encouraging that ‘early actions’ proposed in the Master Plan include dealing with the Fonthill Road ‘rat-run’ and ‘short-term investment in the ‘Community Hubs’. (Hove Station Neighbourhood Forum)</p>	<p>Noted.</p>
<p>Short term action The Forum fully supports the proposals to give priority to ‘<i>short term investment in the Community Hubs</i>’ and public realm works to implement traffic management action ‘<i>to reduce vehicular movements under the railway line and rat-running through the area</i>’. In particular, the NP stresses the importance of the Hove Station Quarter bring allocated a fair share (sometimes referred to as the ‘neighbourhood portion’) of developers’ Community Infrastructure Levy contributions. The report to the Council seeking approval for the SPD should include a request for authority for officers, in co-operation with the Neighbourhood Forum, to submit a report setting out the</p>	<p>The report to committee will provide an update on the emerging situation regarding potential implementation plans. Further information on implementation will emerge from the discussions BHCC is currently having discussions with key stakeholders and appropriate reports will be sent to the relevant committee(s) as and when it is appropriate (when further information becomes available).</p>

You said	We responded
<p><i>process by which these short term actions will be delivered as soon as possible and no later than mid-2022.</i> (Hove Station Neighbourhood Forum)</p>	
<p>Our client fully supports the continued inclusion of the Royal Mail sorting office site within the identified Hove Station Area. The Area brings about an inclusive regeneration project and the SPD will allow for a more comprehensive redevelopment rather than a piecemeal approach. The Site has an important role to play within such redevelopment given its location on the approach to Hove railway station and its visibility from the railway and The Drive to the east. Our client would also like to highlight an inconsistency between information on figure 6.1 and table 6.1 of the draft SPD concerning the site. Within figure 6.1, the Royal Mail Site is clearly shown as an early site/project (green shading), but the corresponding table 6.1 considers it a medium-term project. Given the need to relocate from the facility, the development is considered a medium-term project. An assessment undertaken by Conran & Partners follows similar themes to that undertaken within the SPD on other sites, and as such it is recommended that the capacity of the Site be recognised as ‘approximately 105 dwellings’ and this be incorporated within the SPD. We will continue to promote the Site through the City Plan Part Two process to promote this quantum of development. (Barton Willmore on behalf of Royal Mail)</p>	<p>The draft SPD does not set out targets regarding capacity on any sites. Rather, it focusses on urban design issues. Capacity of individual sites will be assessed with regard to a range of policy documents – including the City Plan Parts 1 and 2.</p>
<p>Appendix 1 – ‘Station Rise’ – unlocking the station area – additional note</p>	
<p><i>Longer term action</i></p>	<p>BHCC is in dialogue with the bus company – as well as other key landowners – regarding the ‘Station Rise’ proposal. As a</p>

You said	We responded
<p>The draft SPD argues that the key to unlocking the full potential of the area is the combined redevelopment of the station car park and adjacent sites to the south, as illustrated in its outline design scheme for Station Rise. The Forum agrees, having discussed this concept some two years ago with Bus Company representatives but was then unable to take it further. The Appendix to the Master Plan suggests 4 phases of action which would be needed to deliver such a project which has clearly been discussed in some detail with the Bus Company, as it is based on the bus company’s preferred redevelopment strategy.</p> <p>However, the appendix indicates that the strategy will involve a significant period of time using much larger area for the open storage of buses on its eastern site on the north side of Conway Street opposite the Hove Gardens redevelopment site - this would not enhance the area. It also indicates the long-term development of a single consolidated site to the west of Fonthill Road/Goldstone Street. Such a site would substantially increase the operational land allocated for the bus depot, including the Council’s Industrial House, and the Matsim owned Agora and the Custom Pharma buildings. The depot would be a big block development which would straddle and close Conway Street, whilst fronting the Clarendon- Ellen Street estate.</p> <p>There is clearly a case for developing an alternative arrangement for relocating the eastern bus depot to the west which would emphasise expansion between Conway Street and the railway line. This would provide the opportunity for at least some of the land occupied by Industrial House, Custom House and the Agora to be redeveloped as a mixed-use project, integrated with the ongoing regeneration of the Clarendon- Ellen estate. The Master Plan reflects significant and long</p>	<p>local planning authority, BHCC will be negotiating outcomes whereby amenity considerations are satisfactorily addressed.</p>

You said	We responded
<p>overdue discussions between the Council, the Bus Company and Network Rail, but there is no indication of meaningful discussion with Matsim – the fourth major landowner o the area. Such an alternative could be comparatively evaluated with the indicative development strategy outlined in the draft SPD appendix.</p> <p>The draft SPD rightly point to the importance for the groundwork to be started now to take forward this key redevelopment project forward would include the Council</p> <p><i>‘..working with stakeholders including the Neighbourhood Forum, brokering discussion between key landowners and/or to consider engaging with a third party agency to provide a key role in land assembly and possibly as a lead developer’ para 6.4</i></p> <p>In 2015-16 the Forum lobbied unsuccessfully for the creation of some form of Hove Station Development Partnership, led by the council and including the major landowners and the Forum to deliver the integrated redevelopment of City Plan Hove Station Development Area 6, in a coordinated process which would deliver and Hove Station Quarter. This is a good idea whose time has now come.</p> <p><i>Thus the report to the Council seeking approval for the draft SPD should include a request for authority for officers to prepare a report which unpacks this statement by setting out the pros and cons of alternative processes which would enable this urgent groundwork to get underway before the end of this year.</i> (Hove Station Neighbourhood Forum)</p>	<p>The council is in dialogue with a number of key stakeholders including the Forum – and is in the early stages of working collaboratively with LCR Property and Network Infrastructure in examining the feasibility and viability of land assembly and a development solution to unlocking the core masterplan area. An arrangement for consulting with the wider community will be addressed and agreed as and if this</p>

You said	We responded
<p>With regards to the phasing of any redevelopment it was quite clear from the various discussions and negotiations that we had held with the Bus Company that a new depot was required before they would relinquish any land for redevelopment. The statement used on several occasions was that they were a transport company not property developers and their priority was to maintain their business. It is inconceivable that the 'Station rise' development could ever be brought forward before a new bus depot is provided. This assumes of course that the Bus Company has not now decided that maximising land value is more important for the running of their business. (Matsim Properties Ltd)</p>	<p>emerging collaborative approach becomes more defined and a likely and viable route towards implementation emerges.</p> <p>BHCC is in dialogue with all key stakeholders including the bus company in working towards strategy that will deliver both the operational needs of the bus company and the 'Station Rise' proposal. These are both key objectives of the draft SPD. It is appreciated that the process is likely to involve complex negotiations with the various landowning interests (including Matsim who are a major landowner in the core masterplan area) to reach an end solution. The draft SPD, once adopted, is intended to assist such negotiations by supplementing higher-level planning policy.</p>

