



## **Hove Station Neighbourhood Development Plan 2019-2030 (Regulation 16), December 2020**

### **Brighton & Hove Council comments**

The following is a schedule of comments by Brighton & Hove City Council in response to the Regulation 16 publication of the Hove Station Neighbourhood Plan between 20 May and 15 July 2021 and submitted to the Independent Examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act. The comments below were reported to the Council's Tourism, Equalities, Communities & Culture (TECC) Committee on 16 September 2021.

## General comments

Several sections of the Plan need updating to reflect further progress since the wording was drafted.

- The Proposed Submission version of CPP2 was published for Regulation 19 consultation between 5 Sept and 30 Oct 2020 and was submitted for examination on 13 May 2021 (along with a Schedule of Proposed Modifications). An examination inspector has been appointed and examination hearings are scheduled to take in Oct/Nov 2021. Formal adoption of the Plan by the Council is now likely to take place in spring/summer 2022.
- The Council's Hove Station Masterplan work has led to the preparation of the draft Hove Station Area SPD which was published for consultation from 14 Dec 2020 to 7 Feb 2021. It is intended to take the SPD (including minor amendments) to the council's TECC Committee for formal adoption in Sept 2021. References in the NP to the 'Hove Station Masterplan/SPD' should therefore be updated to 'Hove Station Area SPD'.
- Several of the NP references to development schemes and planning permissions on individual sites should also be updated – in particular the Matsim development at Hove Gardens (1-3 Ellen St) which is widely referred to in the NP has now been superseded by the Watkin Jones development which was granted planning permission in Oct 2020. Also the Mountpark development at Sackville Trading Estate has been superseded by the MODA permission which covers the whole Sackville Estate/Coal Yard site.

There is also some inconsistency in the NP references to City Plan Part 2, which is referenced in some places as 'City Plan Part II'. These should be corrected for consistency.

The Council has not provided detailed comments on the NP Part Two: Aspirations which is presented as a concept plan setting out some of the Neighbourhood Forum's ideas for how the DA6/Neighbourhood Area could develop. The Part Two document does not include detailed planning policies and is not intended to be subject to detailed examination. The aspirations and concepts are considered broadly consistent with the Council's own vision and strategy set out in the draft Hove Station Area SPD. Some references in the Part Two document should ideally be updated to reflect the more recent progress made by the Council on the masterplan work with the formal adoption of the Hove Station Area SPD now scheduled for Sept 2021 (see above).

## Detailed comments

<b>Paragraph/ Policy</b>	<b>Comment</b>
<b>Section 1: Introduction</b>	
Para 1 (in Section 1.1)	<p>Paragraph numbers start again from 1 rather than running on from the previous section – this needs correcting.</p> <p>The 2<sup>nd</sup> sentence refers to the Hove Station Masterplan without explaining what this is. This needs clarification. Also the council is now taking forward the Masterplan as the ‘Hove Station Area SPD’ which is intended to be taken to the TECC Committee in Sept for formal adoption. Suggest rewriting the sentence to say: <i>“The Neighbourhood Plan is <u>also</u> seen by the Forum as providing <del>the</del> <u>policy context for the Hove Station Area Master Plan for the area policy context for the Hove Station Area Supplementary Planning Document (SPD) which is currently being prepared by BHCC.</u>”</i></p>
Table 2	The dates given for Stage 3 of the NP process will need updating (if this table is retained in the final version of the Plan).
Para 6	In 1 <sup>st</sup> sentence, reference to the “Community Consultation Statement” should be amended to just “Consultation Statement”.
Para 17	Under the first bullet point, when referring to the Hove Station Masterplan/SPD “ <i>future planning work by BHCC</i> ” should be amended to “ <u>current planning work</u> ”.
<b>Section 2: Area Profile</b>	
Para 34	In 2 <sup>nd</sup> sentence, it is not clear what date this development data relates to and what time period is covered by “the next 3 years”. It is assumed this relates to a base date of 2017 in line with the previous paragraph.
Para 51	In 1 <sup>st</sup> sentence, the minimum housing target is DA6 should be corrected to 525 residential units (not 550 units).
Para 62	The paragraph needs updating as the proposed Matsim development at Hove Gardens (Ellen St) has now been superseded by the Watkin Jones development which was granted planning permission in Oct 2020.
Para 91	Presumably this is referring to the railway tunnel on Fonthill Road? This should be clarified.
Para 92	Similarly this paragraph should be clarified by referring to “ <i>the footbridge <u>at Hove Station</u></i> ”.
Para 94	Bullet point ii. Identifies “the effective management of parking provision” as a key issue - however parking is not referred to at all in the previous discussion.
Para 100	Is the detailed description of the previous ‘Sackville Place’ scheme still necessary, given that it has been superseded by the more recent MODA permission which is now being implemented?
Para 102	Again this paragraph appears to be no longer relevant now that the MODA scheme is being implemented.

<b>Paragraph/ Policy</b>	<b>Comment</b>
Para 106	Ditto – same comment as above.
Para 109	The aspirations for redevelopment need to be set in the context that the owners of the Goldstone retail park have stated that they have no plans for any redevelopment in the near future. Also the recent opening of the new Lidl supermarket is likely to increase the footfall and viability of the exiting retail use (at least in the short term).
Para 118	The paragraph wording should be updated to reflect the Council’s more recent progress in preparing the Hove Station Area SPD (which should now be referred to as an SPD rather than a masterplan).
<b>Section 3: Vision and Strategic Objectives</b>	
Para 130	2 <sup>nd</sup> sentence – Need consistency in how Part Two of the NP is referenced.
Para 131	This paragraph needs updating as the Matsim proposals for Hove Gardens and Mountpark for Sackville Trading Estate have both now been superseded by more recent planning permissions for Watkin Jones and MODA. The council is also now considering a recent application by Brighton & Hove Buses (Go-Ahead Group) for redevelopment by the bus garage site.
Para 133	Suggest amending 1 <sup>st</sup> sentence to say: <i>“The key challenge for a Master Plan for <u>masterplanning</u> the Urban Quarter...”</i>
Para 135	Again this paragraph needs updating to reflect the Council’s more recent progress in preparing the Hove Station Area SPD (see comment on Para 118).
<b>Section 4: Policies</b>	
Policy 1	In 1 <sup>st</sup> and 3 <sup>rd</sup> paragraphs, the references to the <i>“Hove Station Masterplan/SPD”</i> should be amended to <i>“<u>Hove Station Area SPD</u>”</i> .
Para 143	Re 3 <sup>rd</sup> sentence, the approved Matsim development for Hove Gardens has since been superseded by the Watkin Jones proposal which was granted permission in October 2020. Also query whether the sentence should describe these proposals as ‘recently’ approved. The sentence is already out of date and will become progressively more so. It may be better to provide a more general commentary which is less time specific. Similar comments apply to Table 4 which is referenced in the following sentence.
Table 4	It is accepted that this table is meant to be illustrative to demonstrate the higher scale of development already subject to planning permission in the Hove Station area compared to the Policy DA6 minimum figures. However, the problem with including such a table is that it in the Plan is that it will quickly become out of date. Some parts of the table already need to be updated (e.g the Watkin Jones development has since gained planning permission which supersedes the previous Matsim proposals at Hove Gardens).  It should also be noted that the 67 residential units at the Hove Sorting Office site does not derive directly from a developer proposal. The site was promoted to the Council by Royal Mail for inclusion as a residential allocation, however the figure of 67 units is the indicative figure for the site allocation in Policy H1 of the City Plan Part 2 and is based on the Council’s own assessment of the site

<b>Paragraph/ Policy</b>	<b>Comment</b>
	potential.
Para 149	In the second sentence, it is not clear if “bettered” refers to the number of jobs generated or the amount of employment floorspace?
Figure 7	This map should also indicate the area covered by Policy 5 for clarification. It is assumed that Policy 5 applies to the whole of the remaining DA6 area south of the railway but this is not clear from the policy wording (see comments on Policy 5 below).
Policy 2	Query the need to retain this policy and the site allocation given that the Sackville Coalyard now has planning permission as part of the MODA redevelopment proposals which also include the Sackville Trading Estate to the north. Both the Coalyard and Trading Estate are allocated as a single larger site under Policy SSA4 of the draft City Plan Part 2 (which was submitted for examination in May 2021).
Para 161	For clarification, suggest amending the 2 <sup>nd</sup> sentence to read: <i>“It is thought that this site will come forward after <u>the end of the plan period.</u>”</i>
Para 162	For clarification suggest amending the 1 <sup>st</sup> sentence to read: <i>“If the site should come forward <del>earlier</del> <u>within the plan period.</u>”</i>
Para 163	As mentioned elsewhere, the Matsim planning permission for the Hove Gardens site has been superseded by permission for a separate development by Watkin Jones, therefore the reference to BH2016/02663 is no longer appropriate. It is suggested that the second sentence of the paragraph is deleted as guidance on development layout principles, including building heights is provided in the draft Hove Station Area SPD which will shortly be adopted by the Council. The proposed SPD is already referenced in Paragraphs 164 and 165.
Para 164	The 1 <sup>st</sup> sentence should be amended to say <i>“<del>The proposed Hove Station Area Masterplan/SPD will provide</del> <u>Hove Station Area SPD provides</u> a range of guidance....”</i>
Para 165	The references to the <i>“Masterplan will provide”</i> should be changed to <i>“<u>SPD provides</u>”</i> .
Policy 4	Suggest re-titling the policy as <i>‘<u>Conway Street Bus Depot</u>’</i> for clarification. In 3 <sup>rd</sup> sentence, <i>“Hove Station Masterplan/SPD”</i> should be amended to <i>“<u>Hove Station Area SPD</u>”</i> .
Para 166	In 1 <sup>st</sup> sentence, the existing use is a ‘bus depot’ rather than a ‘bus station’ as described (it does not operate as a passenger facility). Discussions with the bus company have indicated that multi-storey mixed residential and employment uses above a new bus depot would not be operationally practicable. Therefore suggest deleting the 2 <sup>nd</sup> sentence. In 2 <sup>nd</sup> sentence, <i>“Hove Station Masterplan area”</i> should be changed to <i>“<u>Hove Station area</u>”</i> .
Policy 5	The policy and title (‘Remaining Land South of the Railway’) does not make clear what area is covered and there is no specific allocation or policy extent

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	<p>shown in Figure 7 (see comment above). This should be clarified in the policy title and wording with the policy extent added to Figure 7.</p> <p>In 1<sup>st</sup> sentence, “<i>Hove Station Masterplan/SPD</i>” should be amended to “<u><i>Hove Station Area SPD</i></u>”.</p> <p>In 2<sup>nd</sup> sentence, “<i>Masterplan area</i>” should be amended to “<u><i>Hove Station area</i></u>”.</p>
Para 167	In final sentence, “ <i>Hove Station Master Plan /SPD which will provide...</i> ” should be amended to “ <u><i>Hove Station Area SPD which provides...</i></u> ”
Para 171	Again this paragraph appears to be referencing the now superseded Matsim scheme for Hove Gardens.
Figure 8	The land ownership map shown is now out of date as Matsim no longer own the Hove Gardens site.
Para 181	“ <i>The Hove Station Area Masterplan/ SPD will provide...</i> ” should be amended to “ <u><i>The Hove Station Area SPD provides...</i></u> ”
Policy 8	Query the reason for the policy making specific reference to meeting Building Regulation M4(2). Policy DM1 in the draft City Plan Part 2 already seeks to set the M4(2) standard as a minimum a requirement for all new residential units in Brighton & Hove (i.e not only for specialised housing for the elderly) as well as seeking a proportion of M4(3) wheelchair housing units in all schemes of 10+ dwellings. Including a specific reference to M4(2) in this policy is therefore unnecessary and is likely to be confusing, suggesting that M4(2) would not necessarily apply to other types of residential development.
Policy 9	<p>It would be helpful for this policy to provide greater clarity on what is meant by ‘All development proposals for employment purposes...’ (the policy refers to retail and cultural facilities indicating that it is intended to apply more widely than just industrial and office floorspace).</p> <p>It is also unclear if the policy is intended to apply within the DA6 area or across the whole of the neighbourhood area - the first sentence states that proposals should accord with the local priorities and requirements set out in Policy DA6 whereas the second sentence refers to ‘new retail floorspace within the neighbourhood area’.</p> <p>Suggest a possible rewording of the first sentence as follows:</p> <p><u><i>“All development proposals within the Hove Station Quarter that are for employment purposes or involve employment provision should accord with the local priorities and requirements set out in Policy DA6 of the City Plan Part 1.”</i></u></p> <p>The reworded first sentence should also stand alone as a separate paragraph.</p>
Policy 10	<p>Under point 6, the 2<sup>nd</sup> sentence (in brackets) is no longer up to date following the Council’s introduction of CIL. Open space, sport and recreation are now funded through CIL and therefore all residential developments eligible for CIL will contribute to these facilities through CIL payments. The sentence should be updated or deleted entirely.</p> <p>Re point 5, there is currently some uncertainty as to the potential locations for pocket parks/play areas and this is likely to be influenced by land ownership and development proposals and designs that come forward. It is accepted that the policy refers only to “potential locations”. However, suggest amending the</p>

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	final part of point 5 to say: <i>“Potential locations are indicated on p.48, Figure 6 in this document and in the Hove Station Area SPD. <del>These locations will be subject to the recommendations of the Hove Station Master Plan work.</del>”</i>
Para 203	Please note that the Tall Buildings SPG (SPG15) has been superseded by the new Urban Design Framework (SPD17) which has been approved for adoption as SPD by the TECC Committee on 17 June 2021 and will be published on the Council’s website very shortly.
Para 205	Again note that the previous Matsim proposal for up to 17 storeys on the Hove Gardens site has now been superseded by planning permission for the Watkin Jones scheme which extends up to 18 storeys.
Para 206	Same comment as above – the Matsim scheme has now been superseded by the Watkin Jones permission.
Policy 11	In 1 <sup>st</sup> sentence, <i>“Hove Station Area Masterplan”</i> should be amended to <i>“Hove Station Area <u>SPD</u>”</i> .
Para 206	The paragraph wording should be updated to refer to the SPD17 Urban Design Framework rather than the SPG15 Tall Buildings and also to reference the more recent Watkin Jones permission at Hove Gardens which has now superseded the Matsim scheme.
Para 208	Amend <i>“The Hove Station Masterplan/SPD will provide...”</i> to <i>“<u>The Hove Station Area SPD provides...</u>”</i>
Figure 9	Again should potentially be updated to illustrate the Watkin Jones scheme rather than the Matsim scheme at Hove Gardens.
Para 225	This paragraph covers low and zero carbon decentralised energy opportunities but follows on directly from paragraphs discussing community hubs. It would therefore be helpful to insert a new sub-heading immediately before Paragraph 225.
Para 228	The final sentence should list Ralli Hall as an additional listed building in the Hove Station Conservation Area.
Para 240	This paragraph should make clearer that the NP (Policy 15) is seeking to amend the adopted parking standards to apply the reduced Central Zone parking requirements within the Hove Station Quarter. It is not clear from the current wording.  Also suggest stating that the SPD14 Parking Standards have been incorporated into the draft CPP2 Proposed Submission.
Policy 15	4 <sup>th</sup> para – Suggest strengthening the wording in first sentence to say <i>“...should actively promote, and encourage <u>and provide</u> more sustainable modes of travel....”</i> .
Para 241	The references to ‘Policy 16’ in the third and fourth sentences should be amended to ‘Policy 15’.
Para 243	The final sentence reference to the SPD needs updating. The draft SPD includes reference to the NP promoting centralised parking for commuters,

<b>Paragraph/ Policy</b>	<b>Comment</b>
	visitors and residents if a suitable site can be found. Suggest amending final sentence to say: <i>“This issue <del>will need to be fully</del> <u>is also</u> addressed in the Hove Station Area SPD.”</i>
Para 247	This section should be amended to take account of the emerging City Plan Part 2 (now submitted for examination) and the possibility of the parking standards being reviewed/updated in future. Suggest amending as follows:  <i>“(Relationship to City Plan: SPD14 <u>Parking Standards</u> was adopted in October 2016. <del>and will replace a number of detailed policies and these changes should be inserted into Part II of the City Plan. The policy makes some of the requirements of Policy CP9 more specific and seeks to translate the expectations of CP9 to the local area.</del>) <u>The parking standards are included at Appendix 2 of the draft City Plan Part 2 which also includes a specific policy setting out requirements for new development (Policy DM36 Parking and Servicing). It should be noted that these standards may be subject to future review and revision by the Council.</u>”</i>
P79	It is not clear why the map titled ‘Community Engagement’ has been included here. This appears to be an error?
<b>Annex 1 Priorities for Implementation</b>	
Table 6	The references to <i>“Hove Station Masterplan/SPD”</i> should now be updated to <i>“Hove Station Area SPD”</i> .
<b>Annex 2 Statement of Compliance</b>	
Para 10	Please note that the Council has now made further progress in preparing City Plan Part 2. The Proposed Submission version of CPP2 was published for Regulation 19 consultation between 5 Sept and 30 Oct 2020 and was submitted for examination on 13 May 2021 (along with a Schedule of Proposed Modifications). An examination inspector has been appointed and examination hearings are scheduled to take in Oct/Nov 2021. Formal adoption of the Plan by the Council is now likely to take place in spring/summer 2022.  The Council has also made progress in developing a masterplan for the Hove Station (Policy DA6) area which is now being taken forward as the ‘Hove Station Area SPD’. The draft SPD was subject to public consultation from 14 Dec 2020 to 7 Feb 2021 and is being taken to the council’s TECC Committee for formal adoption in Sept 2021.  The references to ‘Part II’ of the City Pan should be amended to ‘Part 2’ for consistency.
Para 19	Re 1 <sup>st</sup> sentence, please note that City Plan Part 2 has since been submitted for examination (see above).
<b>Annex 3 Summary of Strategic Environmental Assessment</b>	
No comments on this section.	