



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

Summary of External Representations received

The following is a summary of external representations received 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 table below presents a summary of representations received so may not always be verbatim. All original representation documents have been submitted to the Independent Examiner.

The representation summaries below only include comments received on the Draft Neighbourhood Plan Part One: Policies which forms the formal part of the Neighbourhood Plan which will be subject to examination. Comments received on Neighbourhood Plan Part Two: Aspirations are also summarised in a separate Appendix.

Please note that Brighton & Hove City Council's Regulation 16 comments are set out in a separate document.

Rep reference	Name	Date received	Method of submission	Summary of representation
1	Marine Management Organisation (MMO)	01/06/2021	Email	This consultation doesn't have much marine-orientated relevance apart from the mentioning of the Seafront (where our Seascape and Landscape policy within the South Marine Plan Technical Annex may come in), Therefore did not feel it was suitable to fill out the online response form.
2	Gatwick Airport Ltd	02/06/2021	Email	<p>Our current safeguarding area extends out to 15km from the airport, however in the near future it will be extended out to 55km and will include the Brighton & Hove City Council area. We will be issuing new safeguarding consultation maps, with height filters at some point next year.</p> <p>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 Neighbourhood Plan Area be referred to us for assessment.</p>
3	Natural England	15/06/2021	Email	Do not have any specific comments on the Hove Station Neighbourhood Plan.
4	Barton Willmore LLP on behalf of Royal Mail	08/07/2021	Email	<p>The representations have been prepared on behalf of Royal Mail in respect of the Hove Neighbourhood Plan 2019-2030. They are submitted pursuant to a land interest of the client within the Neighbourhood Plan designation, which has been highlighted for possible future development. The Site is Hove Sorting Office, 88 Denmark Villas, Hove BN3 3UG.</p> <p>We have promoted the Site through the various iterations of the Brighton and Hove City Council (B&HCC) City Plan Part Two document in both September 2013 and October 2020. This was</p>

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				<p>also followed by comments to the Hove Station Area Supplementary Planning Document in February 2021.</p> <p>The Site remains an operational facility. However, it has been highlighted by B&HCC as potentially assisting in meeting future housing targets. On the basis that it becomes available in the medium term, subject to viability and a site being made available for relocation. It is essential that any facilities solution is available prior to the demolition of the existing building, to ensure Royal Mail's continuity of service within the administrative boundary of Brighton & Hove. This message has been made consistently through the various consultation responses referenced above.</p> <p>The Site forms part of Development Area 6 (Hove Station Areas) allocated within the adopted Brighton City Plan Part One. The accompanying policy seeks provision of 525 residential units by 2030. The specific Site has been identified for redevelopment of approximately 67 dwellings within the draft City Plan Part Two, which is now submitted to the Secretary of State for examination. This figure of 67 dwellings is directly referenced within Table 4 of the draft Neighbourhood Plan.</p> <p>The key concern relating to the Neighbourhood Plan is the flexibility of the quantum of development with which the Site could provide. To support the City Plan Part Two representations, a high-level capacity review of the Site has been undertaken by Conran + Partners to further ascertain what housing numbers could be provided.</p> <p>The appended capacity assessment* includes a study of a variety of options on how development could be formed across the Site. Of these a preferred option has been identified, which is considered the most appropriate for the Site in terms of scale and relationship to surrounding land uses. This option includes two distinct buildings on the Site providing a combined total of 105 dwellings. The</p>

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				<p>capacity assessment details how the proposal makes best use of the land, and the factors that have informed the proposal.</p> <p>The proposal would bring numerous benefits to B&HCC. As noted within the study, these are listed below:</p> <ul style="list-style-type: none"> • 40% affordable housing provision subject to viability (42 units split between intermediate, affordable rent and social rented units). • 63 much-needed private market houses. • 32 parking spaces at a ratio of 0.31 per dwelling to encourage sustainable living. • Minimal roadways to allow for additional green space. • Respectful of surrounding development. • No single aspect north facing homes. <p>The site represents a significant opportunity to meet identified housing need within B&HCC. As such, we will continue to promote the site through the examination process of the draft City Plan Part Two, with the view to attaining flexibility on the housing numbers. We seek to ensure that if the site could accommodate 105 dwellings, as suggested, then the policy would be worded to reflect that. Policy 1 should therefore be strengthened to allow for such flexibility.</p> <p>This then feeds down to the Neighbourhood Plan. Table 4 refers back to the capacity quoted within the draft City Plan Part Two. However, the Neighbourhood Plan should also consider the findings of the Conran + Partners report and should include a caveat that additional housing numbers could be accommodated where it is demonstrated to be appropriate at the site. This will ensure that the proposed development makes best use of the site in line with national and local planning requirements and ambitions.</p>

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				<i>*A separate site assessment document was appended to the original representation.</i>
5	Bricycles	11/07/2021	Portal	<p>Bricycles represent everyone who cycles in the city. Our particular focus is people who don't currently cycle, but would if safety, convenience and accessibility were improved. We're keen to bring marginalised groups into cycling, including disabled people. This means that the cycling infrastructure needs to be of a consistently high standard.</p> <p>2.5 Transport & Movement / Connectivity (pages 28-30)</p> <p>We support the concept of improving walking and cycling permeability and dealing with rat-runs. The area is currently hostile to walking and cycling, due to large volumes of traffic and the large amount of on-street parking. However, this can only be dealt with by using measures to not just redirect traffic flows but to reduce car dominance. Because the availability of parking generates car use, the overall number of parking spaces must be reduced.</p> <p>Suggest changing Paragraph 94 ii from 'the effective management of parking provision' to 'a reduction in parking provision'.</p>
6	Brighton Active Travel	12/07/2021	Email	<p>Brighton Active Travel is a coalition of groups and individuals campaigning to make the streets of Brighton & Hove safer and easier for active travel (walking, rolling and cycling).</p> <p>We warmly welcome the focus on a community-led neighbourhood plan which enables local people to influence the development of the area.</p> <p>Policy 10: Design and Public Realm - The section on Design and Public Realm is very good, with its emphasis on bringing nature into the city, by increasing green space, by providing new pedestrian and cycle links as green corridors, and with green</p>

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				<p>infrastructure fully integrated in new developments from the start, including street trees, pocket parks etc. This is expected to be funded through S106 within and around developments, and then through the Community Infrastructure Levy for off-site greening. We welcome the idea of one new street tree planted per residential dwelling or 100 sq. metres of non-residential floor space. We need many more street trees in the public realm.</p> <p>We like the Community Hubs idea around Hove Station and Sackville Road and we are particularly pleased with the plan for a 15-minute Hove Station quarter.</p> <p>Policy 15: Parking and Movement - It is encouraging to see that new developments 'should aim to minimise car-based travel and should actively promote and encourage more sustainable modes of travel such as public transport, cycling and walking', car clubs, EV charging points (although we want to stress - NOT on the pavements), cycle parking etc. We are pleased to see that measures should be taken to 'severely limit the speed' of traffic, while facilitating movement through the area - that is important so traffic doesn't head off to find rat runs. It is important that the plan tackles the rat run on Fonthill Road / Goldstone Road by bringing in a one-way traffic system and better routes for pedestrians and cyclists. (page 83 onwards).</p> <p>The footbridge over the station is also an excellent idea. It is vital that the funding for this is procured from the outset as it is the lynchpin of the whole design.</p> <p>Policy 11: Tall Buildings - From the pedestrian point of view, tall buildings (like the 17-storey tower approved on the Hove Gardens site) are entirely negative - they create shadow and dark spaces which don't feel safe, as well as windy spaces which can be very unpleasant to walk through. We do not understand this 'beacon' / 'landmark' justification. No pedestrian uses a tall building to find</p>

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				<p>their way unless they are trying to avoid it. And from the illustrations, the tower is far from architecturally interesting. In addition, tall buildings create very alienating environments for people on foot or bicycle; they fit better with a dated 20th century idea of cities dominated by motor vehicles where the walking and living environment matters less. It is interesting that the plan does actually say 'taller development needs to ensure a high level of amenity and visual and environmental interest at street level to help contribute to the vibrancy and overall attractiveness of the Hove Station Quarter.' (page 80) which suggests there is some understanding of the intimidating and off-putting nature of such buildings. They do not contribute to a Liveable City.</p>
7	Environment Agency	13/07/2021	Email	<p>The main comment that we wish to make (as previously outlined in our response dated 7 May 2019), is that the Hove Station Neighbourhood Plan area falls within Source Protection Zones 1, 2 and 3 for the Brighton Chalk Aquifer. This is a major public water supply which is vulnerable to pollution. Furthermore, some of the proposed development will be on potentially contaminated land above this aquifer. It is therefore necessary to ensure that development is undertaken so as to avoid detrimental impact to the aquifer during both the construction and operational phases of development. We could not see any reference to this within the Neighbourhood Plan document.</p> <p>As this is a key environmental risk, one suggestion could be to add this to the Strategic Objectives on Page 38 of the Neighbourhood Plan Part 1.</p>
8	BHCC Cycling UK	15/07/2021	Email & Portal	<p>Cycling UK's Cycle Advocacy Network (CAN) brings together people with a shared interest in creating the conditions that enable more people to cycle, including better infrastructure for cycling and safer roads.</p>

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				<p>We warmly welcome the following elements of the Hove Station Neighbourhood Plan:</p> <ul style="list-style-type: none"> • Improved links for cycling, walking and inclusive travel • New cycling infrastructure • A more attractive and safer public realm • Car free development • Effective traffic management • Controlled motor vehicle parking • A high level of cycle parking <p>However, we think the plan could be improved by raising the prominence of cycling in the documents i.e.</p> <ul style="list-style-type: none"> • Clear commitment to the Government's new standards for cycling infrastructure, Gear Change and LTN1/20. (The suggested Portland Road cycle lanes look non-compliant.) • Making the impact clear when design decisions affect cycling e.g. one way systems, pavement widening etc. • All one-way systems need a cycling contraflow. Tree planting should not compromise potential cycling infrastructure. Fontthill Road and Newtown Road need to accommodate cycling when measures to prevent rat running are in place, and this is not clear. • Distinguishing infrastructure intended for cycling from that for walking or making it clear when both modes are intended to use the same infrastructure. • Providing an overview of what are specifically the improvements for cycling and cycle routes, and how these connect with the LCWIP and ROWIP. • Requiring new infrastructure such as li>s and bridges to be suitable for cycling, not just walking.

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				<ul style="list-style-type: none"> Ensuring that cycle parking and all infrastructure is suitable for non-standard cycles such as recumbents, tricycles, cycles with trailers/luggage , adapted and special cycles, e-bikes, cargo bikes and children’s cycles. Stating a traffic reduction target <p>It is essential that high standards of cycling provision are employed i.e.</p> <p>Gear Change, “A bold vision for cycling and walking, Department for Transport” July 2020</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-abold-vision-for-cycling-and-walking.pdf</p> <p>Cycle Infrastructure Design (LTN 1/20) “Guidance for local authorities on designing high-quality, safe cycle infrastructure” July 2020</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycleinfrastructure-design-ltn-1-20.pdf</p> <p>We would like to see traffic reduction overall and a limit on the number of intended parking spaces overall, and also in the proposed new car park at Newtown Road.</p> <p>As stated in the Hove Station Quarter Concept Plan, assisting pedestrian and cycle movements, good traffic management and public realm improvements are key to success. Sustainable transport and active and inclusive travel need to have real priority.</p>
9	Highways England	15/07/2021	Email	<p>Policy 1 & paragraphs 140-156, including Table 4 (pages 41-46)</p> <p><i>Support policy/part of the plan subject to modifications</i></p>

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				<p>In its statutory role, Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case particularly the A27.</p> <p>Highways England is supportive of the aims of the Neighbourhood Plan; it is recognised that the developments which are proposed to be undertaken within the plan area are broadly consistent with those set out in the City Plan Part 2, and as such these impacts have been assessed through work undertaken by BHCC with comments and advice from Highways England, via the CPP2 consultation process.</p> <p>Notwithstanding this, the Neighbourhood Plan does propose some potential additional development which is not currently included in CPP2; this is understood to include development of the sites at Clarks Bakery and the “New Wave” development, as stated at footnote 9 of Table 4 (page 44). The Neighbourhood Plan places a strong focus on active and sustainable travel modes, and although this document does not present any traffic flow data or other site-specific information, it is expected that this will positively influence the amount of car-based travel which would be associated with the additional development.</p> <p>On this basis, it is requested that the Neighbourhood Plan should state clearly that any and all planning applications to be submitted in respect of sites within the plan area should include a Transport Assessment (TA) or other technical document which quantifies the expected impacts of vehicular trips on the SRN;</p> <p>Highways England will assess these impacts, including any mitigation or condition requirements which may arise, via the formal planning application process. Highways England welcomes further</p>

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				<p>dialogue with applicants with regard to specific schemes as these develop.</p> <p>It will also be necessary for the Neighbourhood Plan to explain how it will work in tandem with the City Plan to ensure that either individual and/or cumulative impacts of development on the A27 will be appropriately mitigated.</p> <p>We would request that reference to assessment of impacts to the SRN be included within the text associated with Policy 1, as outlined above</p>
10	Historic England	15/07/2021	Email	Unfortunately, on this occasion we do not have capacity to provide a detailed assessment of the plan.
11	Savills for Watkin Jones Group	15/07/2021	Email	<p>The representation is made on behalf of the Watkin Jones Group (WJG), who recently secured planning permission to redevelop 1-3 Ellen Street (LPA Ref. BH2020/00917); also known as 'Hove Gardens Phase 1'. WJG is also pursuing redevelopment proposals for the adjoining bus depot car park immediately west of 1-3 Ellen Street in the context of an extended Hove Gardens development (known as 'Hove Gardens Phase 2').</p> <p>The sites are located within the Hove Station Development Area (DA6). Policy DA6 of the City Plan Part 1 (2016) states that the strategy for this area is to secure the long term regeneration opportunities around the Station area and to enable its development as an attractive and sustainable mixed-use area focussed on employment. The aim is to secure the creation of a high quality employment environment that will attract investment and new employment opportunities for the city and promote the efficient use of land through predominantly employment and residential, mixed-use developments.</p>

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				<p>To achieve the vision for this area, Part B of Policy DA6 states that provision will be made by 2030 for the following minimum amounts of development within the Development Area:</p> <ul style="list-style-type: none"> • 525 residential units; • Within Conway Street Industrial Area – retention/ replacement of 12,000sqm employment floorspace; and • Outside the Conway Street Industrial Area – retention/ replacement of existing with an additional 1,000 sqm employment floorspace. <p>This will be achieved, in part, through the Strategic Allocation of Conway Street Industrial Area (which includes both sites). Part C of Policy DA6 allocates this wider site for comprehensive mixed-use redevelopment to deliver more effective use of the under-used land and buildings, requiring the retention / replacement of 12,000sqm of employment floorspace with a shift into high quality flexible office / business (B1) floorspace, the provision of 200 residential units and enhancements to the streetscape.</p> <p>In January 2019 planning permission was granted at appeal at the 1-3 Ellen Street site for the demolition of the existing buildings and its redevelopment to provide a mixed-use scheme comprising 1,988sqm of office floorspace (Use Class B1), 228sqm of retail floorspace (Use Class A1), and 186 residential dwellings, all in buildings up to 17 storeys in height (LPA Ref. BH2016/02663). The residential element was designed as market sale tenure.</p> <p>In August 2019 WJG acquired the site with a view to delivering the residential element of the extant planning permission as Built to Rent tenure offering a more secure and a less fragmented approach to the management of rented properties than currently offered by individual private landlords. However, through a detailed review of the extant planning permission it became apparent that there were a number of issues with the approved scheme in terms</p>

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				<p>of deliverability. WJG therefore developed a new scheme which better responds to the site and the surrounding area, is more fit for purpose, and optimises this highly accessible and sustainable brownfield site.</p> <p>On the 1st October 2020 the Council granted full planning permission to WJG for the comprehensive redevelopment of the site for a mixed-use development (LPA Ref. BH2020/00917).</p> <p>The extant permission at the site includes the following:</p> <ul style="list-style-type: none"> • 1,662sqm (GIA) of employment floorspace (Use Class B1); • 341sqm (GIA) of flexible employment and community floorspace (Use Classes B1 / D1 / D2); • 216 Build to Rent homes (Use Class C3); and • buildings up to 18 storeys. <p>Prior to the submission of the application WJG was involved in an extensive programme of pre-application discussions with officers at the Council. Using a Planning Performance Agreement this included meetings with a number of specialist officers at the Council, including: planning, policy, urban design, heritage, housing and highways. It also included engagement with a Design Review Panel (Design South East). WJG also consulted extensively with the wider community and local stakeholders. This included local ward Councillors, the local Member of Parliament, the Hove Station Neighbourhood Forum and the general public. The feedback received during this engagement shaped the development with WJG positively responding to any comments where possible. The scheme underwent rigorous testing and the end permission is a result of a collaborative approach between WJG, the Council and key stakeholders.</p> <p>The site is now clear and the extant permission is being implemented.</p>

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				<p>Comments on the Consultation Document</p> <p>Extant Planning Permission for Phase 1</p> <p>As set out above, the Council granted full planning permission to WJG in October 2020 for a new development on the site (LPA Ref. BH2020/00917) to that which was granted at appeal in January 2019 to Matsim (LPA Ref. BH2016/02663).</p> <p>However, the current draft Neighbourhood Plan only refers to the Matsim permission and not WJG's permission, which is in the process of being implemented. Key references within the draft plan include</p> <ul style="list-style-type: none"> • Paragraph 64 • Heading 2.6.2 • Paragraph 113 • Paragraph 127 • Paragraph 128 • Paragraph 137 • Table 4 • Paragraph 191 <p>We respectfully request that the Neighbourhood Plan is updated to refer to the extant permission at the site (i.e. LPA Ref. BH2020/00917) rather than the superseded Matsim permission to ensure that the Plan accurately reflects the emerging context.</p> <p>Furthermore, Section 2.4 of the Plan states that Newgate own the Phase 1 Hove Gardens site. We request that this section is updated to reflect WJG's ownership.</p> <p>Policy 4: Bus Depot</p> <p>Policy 4 of the draft Neighbourhood Plan which concerns the Bus Depot Car Park site currently states that:</p>

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				<p><i>“Proposals for redevelopment and/or rationalisation of the current bus depot to provide or incorporate residential and employment uses will be supported as part of a comprehensive redevelopment of the area of DA6 South of the railway. Development of the site would need to take into consideration the need for an improved linkage to Hove Station and would need to be essentially car free as set out in policy 16. The Hove Station Area Master Plan / SPD will provide the means to ensure that the strategic operational and development needs of the bus company are provided for.”</i></p> <p>Policy 4 as currently worded is strongly supported by WJG. The Bus Depot Car Park site is located in a highly accessible and sustainable location being within an existing urban area, near to Hove Railway Station, key bus stops and a range of local amenities, services and facilities. The site is a brownfield site but significantly underutilised, especially given its location within an identified Development Area. Policy 4 will support the aspirations for the site to provide more employment floorspace (and therefore more jobs) and more new homes.</p> <p>It should also be noted that WJG intends to undertake a comprehensive redevelopment of the Hove Gardens site through Phases 1 and 2 of the scheme. Phase 2 was presented to the both the LPA and the Design Review Panel during the Phase 1 application stage and it was received positively. WJG have recently re-engaged with the LPA on Phase 2 and received further positive feedback on the scheme.</p> <p>Provision of Pocket Parks</p> <p>It is noted that Policy 10 of the draft Neighbourhood Plan states that:</p> <p><i>“Developers should seek opportunities to create new pedestrian and cycle links as green corridors through the area, including</i></p>

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				<p><i>linking up pocket parks and other open space. Where possible, opportunities should also be provided for local food growing and physical activity.</i>" (author emphasis).</p> <p>Despite Policy 4 of the draft Neighbourhood Plan the latest draft Hove Station Area Masterplan includes a focal green space / pocket park at the junction of Goldstone Street and Ellen Street. This partly covers the Bus Depot Car Park site and partly highways land. WJG submitted representations to the latest consultation on the draft Hove Station Area Masterplan strongly objecting to the identification of a focal green space / pocket park in this location. Whilst the draft Neighbourhood Plan doesn't specifically require a focal green space / pocket park on the Bus Depot Car Park site, there should be no expectation to provide this in the context of draft Policy 10. This would be completely at odds with draft Policy 4 of the Plan.</p> <p>Despite objecting to expected provision of pocket parks under Policy 10, WJG are willing to explore the potential for wider public realm improvements through the redevelopment of Phase 2.</p>
12	Resident 1	23/06/2021	Portal	<p>Road traffic</p> <p>I live at the end of Clarendon Road where almost all the road traffic for the scheme will pass. I am extremely worried that pollution and noise will increase for my house due to a massive increase in traffic past my house.</p> <p>Want an impact study to air quality and noise pollution at the west end of Clarendon Road. Object to the scheme until this is completed.</p>
13	Resident 2	10/07/2021	Portal	<p>General comments</p>

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				<p>Increase street tree planting and more greening of buildings with plants growing up the sides of buildings.</p> <p>Think the community energy plan is a good idea.</p> <p>Hove Station Community Hub</p> <p>The Hove station community hub is a good idea. It is much needed as the station and surrounding area are rather neglected at resent.</p> <p>Suggest cameras in the foot tunnel to reduce vandalism and am improve safety.</p> <p>Traffic Management</p> <p>Car use should be discouraged as much as possible so that the new developments do not lead to increased traffic in the area.</p> <p>Suggest more bike lanes on roads in the area so that residents and workers feel confident to move about by bike and not use cars.</p> <p>There should be charging points for electric cars so that if people do have to use cars they choose low emission vehicles.</p> <p>Parking pricing should be raised in the areas to discourage car use.</p>
14	BADGE (late representation)	01/09/2021	Email	<p>We would be very pleased to continue to bring perspective from our community to help you embed access and inclusion into this exciting redevelopment. Whilst our focus is around Blue Badge Parking and Access, our members are living with various disabilities and can bring perspective into the scheme detail for homes, work and leisure. It has been very illuminating reading the documents and we wanted to acknowledge the work to date by the Forum. Even though I live a mere 5 minutes down from the southern boundary line, I had not been fully aware of the scale of the plans until now!</p> <p>Our early observations - BADGE Comments</p> <p>A Fully Accessible Neighbourhood</p>

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				<p>This is an opportunity to improve the access across this area which is currently difficult to traverse if you are a person with mobility difficulties or a wheelchair user, not least because of the sharp changes in level across this area, and the general uphill gradient from the South to North. Existing 'short cuts' (e.g. steps down beside The Station pub) are not accessible, leaving disabled people always having to go 'the long way round'. With good planning that embeds access, rather than adding it as an afterthought, this could be a game changer. Improving access to the railway station, in addition to creating wheelchair accessible crossing points will be essential. As we are fond of saying "get access right for disabled people and you get it right for everyone."</p> <p>Maintain Vehicular Access for Blue Badge Holders</p> <p>P84 Hove Station Neighbourhood Plan</p> <p><i>"All development in the DA6 area should be essentially car-free, by which it is meant that residents will not be eligible for a Residents Parking Permit."</i></p> <p>It is important to consider that vehicular travel and parking will still be needed for those disabled residents, workers and visitors who are unable to park on the periphery and make their way by alternative means. The Blue Badge scheme has proximity as its heart - being able to park as close to the destination as possible is what enables disabled people to go about their day equitably. Similarly, some disabled people may not own or lease a vehicle, or be able to use buses easily, but they might use the Council's taxi vouchers scheme. So access to residential areas will still need to be provided. If there isn't access to homes, work, leisure, then this would create a segregated area which would breach PSED.</p> <p>Accessible Housing (Purchase and Rental) is Urgently Needed.</p>

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				<p>With such a large-scale redevelopment there is a golden opportunity to create successful living options for All. Adapted properties are scarce across our city, the topography makes some parts of the city less favourable, and some people wait for years to be housed. We would like to see this aspect featured as a core component of a 'community for all' approach. With everything you could possibly need within this new quarter, it should be an attractive option, especially when work and retail units can be designed from scratch to be fully accessible. We would welcome an additional Policy within the Hove Station Neighbourhood Plan to include Adapted/Adaptable Homes.</p> <p>Community & Voluntary Sector</p> <p>Is there scope to make provision to welcome CVS organisations in the Plans? Office space is costly, the pandemic has highlighted how essential the CVS in our city is - can the regeneration recognise and embrace the role of these smaller community based operations by factoring in affordable work/office units?</p> <p>Youth Perspective and Successful Integration</p> <p>Lastly, in recognition of the high numbers of young people living in the surrounding areas, and the proximity of 3 large secondary schools, an ongoing 'youth voice' within the development of these plans will ensure that the regeneration provides safe local micro recreation areas for young people to safely hang out (rather than hanging around), as well as other needs and ideas that being middle aged, we couldn't possibly anticipate?! Planning with purpose for everyone, means that this area is more likely to be a 'safe neighbourhood' and this is something that is critical for disabled people and elders, some of whom may feel or be more vulnerable when out and about and feel intimidated by large groups of youngsters 'hanging around'. With some of the areas earmarked for high buildings, care must be taken not to replicate some of the vulnerabilities of the London housing schemes - cut throughs</p>

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				<p>between buildings can be dangerous if narrow, dark, out of public sight and the risk of bikes cutting through. Sharp corners should also be avoided. A couple of helpful principles here: 'if it works by night, it will work by day' & 'no short cuts unless everyone can use them safely and easily'.</p> <p>Accessible Plans for an Accessible Neighbourhood</p> <p>As ever, the devil is in the detail, so as these plans proceed through the various phases, it will be essential to create as vivid and realistic a representation as possible to encourage productive insight, and to foresee potential opportunities or difficulties that might present for people across pan-disabilities. Plans should be in an accessible format that can be viewed across different devices as not everyone has the benefit of large computer monitors, or even access to technology or the skillset to view online documents. Detailed plans with a high content level can be difficult for lay people to get their heads around, and as these plans develop, it would be helpful to consider ways to mock up some of the component parts, and overlay audio descriptions so that they are more accessible. Creating some kind of portable roadshow in due course, would enable these Plans to be shared across schools, libraries, community centres, churches, coffee shops, shopping areas, day centres etc. which will bring in a more diverse and fully representative community response. This will be a wholesale change, and it will create extensive disruption – so taking people with you on the journey as inclusively as possible will be essential. We are happy to help and facilitate feedback from our BADGE community, especially those members living within or around the regeneration areas.</p> <p>Does the Hove Station Neighbourhood Forum have any disabled representatives on their Board/Committee? It might be helpful to enlist, if they don't.</p>

APPENDIX

Comments received relating to the Draft Neighbourhood Plan Part Two: Aspirations

Rep reference	Name	Date received	Method of submission	Summary of representation
5	Bricycles	11/07/2021	Portal	<p>Bricycles represent everyone who cycles in the city. Our particular focus is people who don't currently cycle, but would if safety, convenience and accessibility were improved. We're keen to bring marginalised groups into cycling, including disabled people. This means that the cycling infrastructure needs to be of a consistently high standard.</p> <p>Comments on Submission Plan Part 2: Aspirations (page 9)</p> <p>Agree with the proposal to keep new developments car-free and to improve the pedestrian crossing on Sackville Road/Old Shoreham Road, as well as the public realm improvements in the following section.</p> <p>Would like to see explicit references to secure cycle parking for both new developments and existing housing, including provision for cargo bikes, trikes and adapted cycles.</p> <p>(page 9)</p> <p>Support lower speeds but would like to see a firm strategy to reduce car use. Car dominance in the area provides an unpleasant environment which has a negative impact on tourism and local businesses. It also leads to poor air quality and puts people off walking and cycling.</p> <p>Would like to see a more robust approach to car travel, which aims to reduce it and not merely 'manage' it. As well as pinch points, we would recommend point closures to end rat-running in the Clarendon Rd/Ellen St/Conway St neighbourhood and also in Poets Corner (Coleridge St etc) which is a continuation of the same rat-run.</p>

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				<p>A point closure could be considered outside Hove Station, to deter rat-running and provide a much more pleasant environment for walking and cycling. The current tactile paving outside the station has done nothing to reduce vehicle dominance or speed.</p> <p>Paragraph 2.3 (page 14)</p> <ul style="list-style-type: none"> - Support the extension of the cycleway along the Old Shoreham Road (although this is currently under pressure due to lack of political support for existing temporary lanes). This has been identified as a priority cycling route in the draft Local Cycling & Walking Infrastructure Plan (LCWIP). - Would like to see segregated cycle lanes added to Sackville Road, which is currently dangerous for cycling due to constantly varying lane widths, erratically spaced parking bays and varying vehicle speeds. This route has been identified as a priority cycling route in the draft LCWP. - Concerned with the approach to 'opening up' Goldstone Lane / Fonthill Rd. If not managed correctly, this could become yet another rat-run. - Also concerned with an east-west link between Newton Road and Sackville Road. Would like to see pedestrian and cycle access via this route, but if vehicle traffic was permitted, this could also become another rat-run and contribute to increasing vehicle use in the area. - Support the concept of reducing carriageway width in the tunnel on Fonthill Rd. This is currently a rat-run, with speeding common and it's treacherous for cycling. If this was reduced to single lane, it would have to be sufficiently narrow to make it impossible for vehicles to overtake cyclists. Ideally, segregated cycle tracks would be installed in the tunnel. <p>Page 52</p>

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				<p>Strongly object to the concept of reducing pavement space. Pavements are wide in places on Portland Road, and this provides a pleasant walking environment where people are kept at a greater distance from traffic and also provides the possibility of restaurants and cafes having outdoor tables.</p> <p>The carriageway on much of Portland Road is unnecessarily wide and this encourages speeding, as well as dangerous overtaking of cycles.</p> <p>Object to the design of the cycle lane in figure 3.7. It is not in line with Local Transport Note (LTN) 1/20 'Cycle Infrastructure Design', published last year, which says that paint-only cycle lanes will no longer be funded and that cyclists should be kept physically separate from volume traffic. The design of the lanes as proposed could increase danger to cyclists, as buses and cars cut across it. In addition, there's nothing to stop vehicles from parking in the lanes. The lanes seem very similar to those outside Hove Library, which offer no protection to cyclists.</p> <p>Suggest keeping the existing pavement width and extending it where possible.</p> <p>Also suggest physically separated cycle lanes on each side of the road and a narrowing of the carriageway to the absolute minimum necessary (a similar approach to that taken in the current redesign of Western Road). Cycle lanes must be in line with LTN 1/20 standards. We would suggest 'floating' bus stops and parking bays (ie the cycle lane is next to the pavement, followed by the bus stops and parking bays - the reverse of the scheme presented in 7.3).</p> <p>Suggest removing parking from one side of the whole of Portland Road, to increase visibility for pedestrians, cyclists and all vulnerable road users, and consolidating it on one side, with an overall decrease in bays, to reduce car dominance, given that</p>

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				<p>parking generates car use. We would like to see an overall increase in blue badge parking bays.</p> <p>Paragraph 4.2 (page 29)</p> <p>Agree with the approach of reducing the need for car travel throughout the area, and with the principle of reduced parking for new builds. However, the document still seems to point to an overall increase in cars in the area.</p> <p>Would like to see a firm strategy of gradual on-street parking reduction, with parking bays replaced by street planting and cycle storage - particularly secure cycle storage for residents.</p> <p>In Paragraph 4.7, propose a reduction to parking capacity around the station. The availability of parking at the station attracts cars to the area. Not convinced by the idea that people will drop their train journey in favour of making the entire journey by car as a result. It's currently far too easy to drive a few minutes to the station and park there, instead of walking or taking the bus.</p> <p>To compensate for loss of parking, would like to see much better bus links with the rest of Brighton and Hove, with a number of routes serving Hove Station. There is currently no direct bus route between Hove Station and most of Hove.</p>
6	Brighton Active Travel	12/07/2021	Email	<p>Brighton Active Travel is a coalition of groups and individuals campaigning to make the streets of Brighton & Hove safer and easier for active travel (walking, rolling and cycling).</p> <p>Comments on Neighbourhood Plan Part 2: Aspirations</p> <p>Much of the description is attractive and it's positive that the proposals call for traffic management with the CPZ and 'Car Free' development. In fact the car free development will allow 0.25 cars per dwelling and some visitor parking. There will be a car park of 1</p>

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				<p>or 2 storeys. The number of parking spaces isn't specified. This might be normal for an outline document, but Brighton Active Travel seeks an overall reduction in car parking.</p> <p>Traffic will be encouraged to Newtown Road. Arrangements for the Fonthill Road tunnel do not sound reassuring for cycling and there must be a contraflow if there is a one way system' at Hove station.</p> <p>The aspirations for cycling, cycle routes or cycle parking aren't clear. The statements are rather general. Several of the illustrations don't show cycling and the cycle parking looks odd.</p> <p>The example of a cycle lane in the Stoneham section does not appear to be compliant with LTN 1/20. It is unprotected, only advisory and with parking on the kerbside. There is a need to clarify 'shared surface roads'.</p> <p>The pavement is narrowed on Portland Road to accommodate a cycle lane, when the carriageway on Portland Road is already very wide and this encourages speeding. Brighton Active Travel strongly opposes any narrowing of the pavement and instead calls for cycle lanes and tree planting to occupy part of the current carriageway.</p> <p>The design in the document shows 'a buffered cycle lane 'that does not impede the flow of traffic'. It appears to be painted lines, similar to Church Road, near Hove Library. In the diagram, it's on the outside of parking and bus stops, meaning it offers little protection to cyclists and is not in line with LTN 1/20.</p>
8	BHCC Cycling UK	15/07/2021	Email & Portal	<p>Cycling UK's Cycle Advocacy Network (CAN) brings together people with a shared interest in creating the conditions that enable more people to cycle, including better infrastructure for cycling and safer roads.</p>

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				<p>Our specific comments on the Part 2 Aspirations document are listed below:</p> <p>Page 7 Paragraph 15: Any one-way system such as at Goldstone Villas must have a cycling contraflow</p> <p>Page 8 “Development pipeline” for “HSNF proposals to support and accommodate this development” points:</p> <p>“2. New lifts for existing pedestrian bridge” - should accommodate cycles as well as people.</p> <p>“3a. Option a New Pedestrian bridge” - should accommodate cycles as well.</p> <p>“10. One way system at Hove Station” - all one ways must have a cycling contraflow.</p> <p>Page 9 Paragraph 20, 21 - Motor vehicle traffic is the reason why 66% of people believe it is too dangerous for them to cycle. Effective design and measures will be needed to control motor vehicle traffic and keep speeds low. Traffic calming must not impede people cycling, walking or wheeling.</p> <p>Page 9 Paragraph 22 - We support the incorporation of the area into Controlled Parking Zones and making new development car free.</p> <p>Page 10 “2.2.3 Public Realm Improvements” Paragraph 24 - We support tree planting, but it should not compromise cycling infrastructure in this plan or in the future, and this should be clearly stated. Goldstone Villas and Portland Road are part of the cycle network in the developing LCWIP. Neither have cycling infrastructure yet, but are highly suitable for cycling.</p> <p>Page 12 “2.2.4 Design benchmarks” Paragraph 25 - Regarding “benchmark” examples. Figure 2-9 is of the area at the north side of</p>

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				<p>Brighton Station designed by Hyde. The path and landscaping includes steps and sharp corners (not shown) and is not suitable for people cycling, using wheelchairs or mobility aids. Although a li> is provided, this does not solve the issues on the path, and we would not choose it as an example of good design. Figure 2-8 - “Inspired streetscape”: The day-to-day operation of New Road is much more obstructed and chaotic than it appeared at design stage. If shared surface is employed, it needs to be very carefully designed so that there is safe passage for people walking, cycling, wheeling. Those with visual impairment need special consideration. The use of space for extended areas of café tables, commercial activities and events also means that it is lost for active travel.</p> <p>Page 13 “The development of the Community Hub Projects” Paragraph 29 says: “identify opportunities (both short term and longer term) for potential improvements to roads, footpaths, landscaping, accessibility, and individual buildings – to make their hub more attractive “. “Cycling infrastructure” needs to be included in this list. It is mentioned later (paragraph 31) but cycling infrastructure should have equal status with footpaths and road improvements.</p> <p>Page 14 “2.3 Projects“ Paragraphs 32 - 33 with bullet points: Walking and cycling have some overlaps but are distinct modes. Cyclists want to cross Hove Station the same as pedestrians do. Listed points include “upgrade or rebuild of the existing Hove station footbridge to accessible standard ” and: “A new footbridge across the railway to the current station car park as shown on the concept plan...” Cycling needs to feature more clearly as part of the plan. The term “footbridge” leaves cycling out.</p> <p>“A refurbishment of Fonthill Road railway bridge encompassing a widening of the pavements on either side “ - but what are the</p>

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				<p>arrangements for cycling? This route needs improving for cycling, too.</p> <p>The “wide sweep of steps” will of course require ramp access for people with cycles, using wheelchairs/buggies, mobility aids etc.</p> <p>We support the continuation of the segregated cycle lanes along Old Shoreham Road. This plan needs to link to the LCWIP and take account of the ROWIP.</p> <p>Extensive public cycle parking is welcome. Two-tier cycle parking is difficult if not impossible to use for people who are not very strong or have mobility impairments, so adequate ground level parking should be available.</p> <p>The cycle parking should also accommodate non standard cycles e.g, tricycles, tandems, recumbents, cargo bikes, cycles with luggage attached (common at stations) and children’s cycles etc.</p> <p>A high level of cycle parking should also be required in the planning applications for redeveloping sites in the area.</p> <p>We note that a 1 or 2 storey car park is proposed at the junction Newtown Road / Fonthill Road. We haven’t seen a figure for how many spaces this would be. It would be in keeping with the aims of this plan to keep the accommodation for cars and vans low, and aim at a target for overall traffic reduction. People will be walking and cycling in the area.</p> <p>Page 15 Paragraph 34: Again, the point about “The reduction of carriage width under the Fonthill Road railway bridge to provide wide pavements and single lane alternative movement of cars under the bridge. “ gives no indication about cycling. It is as though cycling has been lost between car-based travel and pedestrians.</p> <p>“Shared surface roads along Conway Street and Goldstone Villas in the vicinity of Hove Station” – Motor vehicle speeds must be low.</p>

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				<p>Motor vehicle traffic needs to be reduced. Passage for cycling and walking needs to be kept clear because the experience of shared surface is that there is gradual encroachment on the space.</p> <p>We support “An improvement to the Sackville Road / Old Shoreham Road junction” to reduce danger for people cycling and walking.</p> <p>Page 18 “3.1 CH 1 – Hove Station Community Hub” Paragraph 41: Cyclists also need to cross the bridge. Brighton and Hove City Council attempted to address this several years ago with gutters on the side of the steps going up to the bridge. Cyclists should not be excluded from design at the outset as seems to be the case, particularly by continuing to refer to the bridge as a “footbridge” rather than a “bridge”. Passage for cyclists needs to be either via the li> with their cycles or, as would be ideal, being able to cycle across. Some disabled cyclists will not be able to dismount. Only able-bodied people without cycles are shown using the stairs and bridge, but no one with a cycle or wheelchair.</p> <p>Page 20 “Hove Station Hub (CH1) – North of Railway”: “Shared surface” needs to be employed with care so that vulnerable groups are not disadvantaged by the lack of specific infrastructure boundaries.</p> <p>Page 21 “Hove Station Hub (CH1) – South of Railway”: The illustration does not show anyone cycling. Presumably, people cycling will be accommodated on the road.</p> <p>Page 22 “3.2 CH2 – Sackville Rd / Conway St Community Hub”: The illustration shows cycle parking that is unlikely to be suitable for a range of non-standard cycles. Again, there is no one cycling in the illustration.</p>

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				<p>Page 23 - the illustration references a pedestrian route but nothing about cycling.</p> <p>Page 24 “Figure 3-6 Indicative site & landscaping study - Conway Ct & Honeycroft Centre” - This illustration references a pedestrian route but no cycling route. Paragraphs 43-47 do not describe cycling routes but only refer to “providing a pedestrian link from Poets Corner to Conway Street.”</p> <p>Page 26 “3.3 CH3 – Stoneham Community Hub” Paragraph 52: We are not in agreement with the suggested design for Portland Road cycle lanes. Space should not be taken from pavements to provide for car parking. The cycle route is marked as advisory only and although it is described as “buffered” it looks totally unprotected from motor vehicles. People cycling will be vulnerable due to parking at the kerbside, which will result in motor vehicles crossing the cycle lane back and forth. We would suggest that this is not compliant with LTN1/20. A bus stop cycling bypass should also be considered.</p> <p>Page 28 “SECTION 4 The Need for a Traffic Management Plan for the Area” - We strongly support measures to reduce and control traffic both in the central area and in surrounding roads.</p> <p>Page 29 “4.3 Car-based trip generation arising from new development”.- Car based trip generation needs to be designed out of new developments.</p> <p>Page 30 “4.4 Managing traffic impact on surrounding roads “ - Drivers using Fonthill Road and Newtown Roads need restraint, but arrangements for cycling journeys are not described: “ ...One of the alternative options suggested for Fonthill Road would be alternating movements through the tunnel following a substantial widening of the currently unsuitably narrow pavements on either side.” Cycling is not mentioned.</p>

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				<p>Page 30 “4.5 Facilitation of pedestrian and cycling movements” Paragraph 65 says: “In principle pedestrian and cycling links throughout the area should be given high priority.” - There should be no “In principle” or weakness in this statement. It should read: “Pedestrian and cycling links throughout the area must be given high priority.”</p>