



**Planning application BH2019/03548 MODA
Sackville Trading Estate and Hove Goods Yard
Comments Submitted 21.02.20**

1. INTRODUCTION

The Hove Station Neighbourhood Forum supports this application, albeit reluctantly in the context of a likely maximum 10% affordable housing provision, subject to the satisfactory resolution of the potentially adverse impacts on the local road network of the very high density development proposed.

The Regulation 14 Pre-Submission Draft Hove Station Neighbourhood Plan (NP) was published for public consultation from March 23rd to May 15th. The following comments assess the proposed MODA development, with reference to the Draft NP policies and the amendments which the Forum has been working on in response to consultation responses - not least the key issue of the local traffic and parking impacts of the high density redevelopment of the BHCC City Plan Hove Station Development Area 6 (DA6)

From the outset, the MODA team has worked positively in informal workshops with the Forum. These exchanges have fully acknowledged the Forum's responsibility to minimize the negative impacts on the local community of the proposed redevelopment, whilst maximizing the benefits of the proposal, both to the local community and the city as a whole. MODA's approach to engagement with the local community via the Forum from the earliest stages in the development of a major project is a very welcome innovation, as a step towards a more transparent private sector-led redevelopment process.

Thus MODA has bought into the Neighbourhood Plan's Vision of the implementation City Plan Policy Hove Station Development Area 6 in a way which creates a mixed use Hove Station Urban Quarter that straddles the railway line and aspires to carbon neutrality. Their proposal for this last of the City's major brownfield sites (3.59 hectares- 8.8 acres) will make an urgently needed substantial contribution to meeting the city's housing and employment needs, which would otherwise have to be met by urban fringe 'greenfield' development - with adverse environmental consequences which the Council's recent declaration of a Climate Emergency has brought into increasingly sharp focus.

In this context, the Forum welcomes the modifications to the original mixed use proposal which now combines

- 564 housing units reduced from 591, with studios reduced from 18% of the total to 9%, and 2-3 bed units increased from 47% to 55%, together with an increase to 33% of units with private balconies; and
- Additional space for employment uses to provide for an increase in jobs from 450 to 560

The revised application has maintained

- the high quality urban design which meets BHCC standards for energy and water efficiency buildings, and waste management
- the imaginative public spaces, including a public square, together with the green landscaping which preserves and adds substantially to existing on-site trees: and
- the range of community facilities, many of which will be accessible to neighbouring residents..

The revised scheme will still generate significant Section 106 developer contributions, some of which it will be possible to invest locally to bring benefits to adjacent and nearby neighbourhoods.

However, at the onset of our dialogue with MODA on this second application last October, we were informed that the landowner (the Coal Board Pension Properties Ltd,) had not agreed to re-instate the 10% affordable housing offer which it had made last summer, but had withdrawn it following the refusal of the first application.

The Forum immediately made it clear that it would formally object to any revised scheme which provided zero affordable housing. The offer of 10% was eventually re-instated by a letter to the Council, received on February 13th.

We also re-iterated our concerns about the traffic and parking impacts on adjacent residential areas of the proposed redevelopment, which have been a major issue in the parallel lengthy discussions needed to amend our NP policies in order to respond to the results of our consultation on the Draft NP.

2. THE NEW NEIGHBOURHOOD AS A KEY COMPONENT OF THE HOVE STATION QUARTER

The project will play a major role in creating the identity of the new Hove Station Urban Quarter, as an integrated mix of 19th century, 20th century and contemporary 21st century development, accommodating a socially inclusive and diverse population, varied building forms, a wide range of housing tenures and increased employment provision, not least in modern creative and digital sectors.

The Old Shoreham Road is the boundary between the very densely developed, mainly 3-5 storeys 19th century inner urban area and the 19th century Hove Park, originally provided by the Victorian 'city fathers' to meet the recreational needs of both the residents of adjacent very high density residential areas within walking distance to the south, and those living further afield in the rapidly developing town.

The 20th century comprehensive redevelopment of the very dense Conway Street area introduced 10 storeys, high rise council housing blocks, which made urban Hove visible from Hove Park from the 1970s onwards. The MODA proposal is for the second redevelopment of the former railway sidings and goods yard, replacing the 1930s industrial estate and the low density, mainly temporary re-uses of the former coal yard. Thus the scale, massing and density of the MODA redevelopment will replace the view from the north of the council housing blocks with a view of much more prominent modern high rise blocks.

The 21st century, high density, high rise Hove Urban Quarter will be much more visible - and not just from the north. Some residents see this prospective major change to the Hove townscape in negative terms- as a threat, with high rise too high a price to pay for the benefits of redevelopment.

But others welcome the opportunity to maximize the positive benefits of a vibrant new high density/high rise community being created in a badly neglected and run-down part of Hove and leading the development of a new Hove Station Quarter, with the potential for carbon neutrality. The benefits for the city of housing and jobs will be accompanied by very substantial developer financial contributions, some of which will be invested in nearby neighbourhoods, including the maintenance and enhancement of Hove Park, for the benefit of both incoming and existing residents.

Thus the emerging high density, substantially high rise urban Hove Station area and the long established, low density, low rise suburban Hove Park area will continue to have distinctive identities but also a continued mutually beneficial interrelationship.

3. HOVE STATION QUARTER CONCEPT PLAN: JOINED UP REDEVELOPMENT OF DA6

The Forum welcomes the fact that the MODA proposal is for an accessible, rather than a 'gated development', which is explicitly designed to promote the integrated physical development of a new Hove Station Quarter, by incorporating two fundamental connectivity principles of the Forum's Hove Station Quarter Concept Plan, which were subsequently included in the emerging City Plan Part 2 Policy SSA4.

An eastwards extension of Poynter Road to Newtown Road.

The layout of the project provides for a second exit from the site which would link it to the eventual mixed-use, redevelopment of the Newtown frontage and the Goldstone Retail Park, which should be virtually car free.

Approval of this application should include a formal commitment by the Council to a process of land acquisition, using compulsory purchase powers if necessary, to enable the construction of this link, funded from DA6 developer contributions, before the completion of the redevelopment of the northern part of the site - the former Trading Estate.

A pedestrian link, via a new footbridge, to the platform level of the station.

MODA fully acknowledge the vital importance of this link. Whilst it is not included in the current application, MODA has assured the Forum that it is fully committed to securing the link, as it will bring major benefits to their tenants, providing an alternative to the existing pedestrian link under the railway bridge and along Conway Street. The Forum accepts that the high cost means that the link cannot be funded solely from S106 developer contributions. However, MODA informed us that they are in discussions with the Council and Network Rail to establish a joint funding arrangement as soon as possible.

Approval of this application should include a formal commitment by MODA to the development of a joint funding process by which this link can be provided before the completion of the redevelopment of the southern part of the site -former goods yard.

4. HOMES FOR TENANTS

In sharp contrast to conventional 'Build for Sale' housing development scenarios, the proposed MODA development is a BUILD TO RENT (BTR) scheme which, combined with the Mayfield Care Community (providing homes for sale), will establish an intergenerational community, living in a primarily residential

neighbourhood, that will also provide some 560 jobs in flexible office space and very small allocation of retail space. MODA will own and manage their scheme for a minimum of 30 years. This innovative development and management process offers the attractive prospect of a well maintained, sustainable neighbourhood, which will make a major contribution to the diverse quality of the Hove Station Quarter.

All the MODA homes are to be let on three year tenancies, no service charges will be levied and no deposits taken. This means that these homes will provide a much better deal for tenants compared with the majority of the city's private rented housing stock,

However, the Forum is concerned that these rented properties may well be attractive to Londoners, given the location so close to Hove Station, and simply draw more people into the Hove rental market. ***Thus MODA should be required to develop a lettings policy which gives priority to local applicants in the allocation of all tenancies, not just in the allocation of the affordable units as required by the City's affordable homes policy.***

4.1 MARKET RENTS AND AFFORDABLE HOUSING

Affordable units will be exactly the same in appearance and specification as the market rent homes and their tenants will have access to all the shared facilities on site. These are positive features compared with the common practice of segregating affordable units and denying 'subsidised tenants' access to facilities such as play areas.

MODA market rents pcm
£1,250 one bed, £1,600 for two beds and £2,100 for three beds
MODA affordable rents with 25% discount pcm
£940 one bed, £1,200 for two beds and £1,575 for three beds

These discounted rents include free access to wide range of community facilities provided as part of the development and are not subject to deposits. They will not be affordable for low income households but will be affordable and better value for many existing private tenants of flats in mainly lower quality conversions of 19th century housing nearby, paying rents pcm which are typically £750-£850 1 bed, £1100-£1300, for two beds £1400-£1600 for three beds

4.2 GOVERNMENT REQUIREMENT FOR A VIABILITY ASSESSMENT

The scheme has been subjected to a government required viability assessment conducted by an independent value, appointed by the Council, but paid for by the developer. This report was logged on the BHCC web-site on 19th February concluded that the proposed development would generate a profit of 11.72% of the development cost incurred - well below the approved industry standard of 15%

Given the requirements of planning law and national policy guidance, this means that the Council cannot require MODA to provide any affordable housing and that the decision whether to proceed with the scheme providing some level of affordable units is at the discretion of the applicant.

The landowner, Coal Pension Properties Limited, used this discretion on February 13th, to offer 10% of the rented units at 75% of market rents for a period of 15 years, stating that '...for the avoidance of doubt, in the event that the application is refused or deferred on 4 March 2020 then this offer shall be treated as withdrawn'

This is a disappointingly low level, given that recent national planning policy guidance for Build to Rent homes states that

'...20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme'

Ministry of Housing, Communities & Local Government Guidance on Build to Rent 13.09.18 p 2

The Forum therefore requests the Council to negotiate further with the developers - albeit at the last minute- to secure a higher level of affordable housing units. This would enable more households on modest incomes to live in the development, thus contributing to its social diversity - a further demonstration of MODA's goodwill towards the development of the new Hove Station Quarter.

4.3 GOVERNMENT REQUIREMENT FOR A FIVE YEARS SUPPLY OF HOUSING SITES AVAILABLE IN THE CITY.

The Forum understands that the Council could refuse the application, perhaps on the grounds of overdevelopment. But the city does not have a 5 year supply of housing sites with planning approval for development. This is required by government planning policy, as a means of ensuring that Councils secure the provision of the volume of housing required by their government approved City Plan over the 15 years approval.

The MODA development will deliver 1 year of the required 5 years supply. In this context, in parallel with this second application, MODA has appealed against the refusal of the 2018 application. The public enquiry, which will also considered the second application is scheduled for late April and will go ahead if the March 4th Planning Committee refuses this revised application

The absence of a 5 year housing supply will almost certainly mean that this appeal will be upheld, with no provision of affordable housing. Matsim's Hove Gardens appeal last year was upheld. The government planning inspector gave planning consent for the scheme with 10% affordable housing compared with the 19% the company had originally offered. It was the absence of a 5 year housing supply which tipped the balance in favour of the developer's proposal.

In the unlikely event of the planning inspector refusing the appeal it is likely that the Council would then be faced with two issues.

- The continued underuse of the site until another developer comes forward with a scheme, supported by the landowner, which the Council finds acceptable. But a lower density, medium rise, commercially viable development would reduce the number of housing units and/or jobs provided and minimise the provision of public spaces/community facilities, thus reducing the quality of the new neighbourhood.
- A continued undersupply of housing sites with planning approval which will undermine the Councils ability to resist developer pressure elsewhere in the city.

5. DEVELOPMENT DENSITY AND BUILDING HEIGHTS

Council planning policy requires the high density mixed-use redevelopment of the site. The former coal-yard site was allocated for waste management purposes in City Plan Part 1, approved by the government in March 2016. This would have made the creation of a Hove Station Quarter impossible. So in 2016 the Forum organized a petition to object to this allocation (alongside the objection from the

landowner) and proposed that the site be re-allocated for high density mixed use redevelopment, in combination with the trading estate. The 600 signatures demonstrated local residents' support for this campaign. The designation was removed, thus paving the way for the Forum to develop its vision in the Hove Station Quarter Concept Plan.

The emerging City Plan Part 2, subsequently published for consultation in 2018, proposed a minimum of 500 residential units on the site, but did not indicate a maximum and that this should be integrated with 6000 sqm of employment floor space. MODA have substantially exceeded the minimum housing requirement and substantially met the employment requirement by developing a very high density, substantially high rise project.

City planning policy identifies the DA6 as a node for taller buildings, defined as 8-15 storeys in height.

The proposed well designed, modern high rise buildings proposed would not be out of character in the emerging Hove Station Quarter, which already includes the 10 storey Clarendon-Ellen estate, the 8 storey Cliftonville Tower and a 17 storey apartment block in Conway street recently approved by a government planning inspector as part of the Hove Garden project. In this context, the highest buildings have been appropriately located to the south of the site- opposite the Clarendon estate. With the exception of the view from Poynter Road and from immediately in front of the main pedestrian entrance to the development, the highest buildings are significantly screened by the proposed lower rise Sackville Street frontage, which will include a lowered southerly section of the existing 19th century pebble dashed high wall.

The Forum is well aware from its engagement with local residents that there is now broad support for the principle of mixed use development of the site. However, over a third of the 89 objections are to the height of the buildings, particularly the increase in the revised application in the height of the two tallest buildings from 13 storeys to 15 storeys

In our discussions with MODA we made the point that an alternative layout with buildings between 8 storeys and the 10 storeys height of the nearby Clarendon Road flats may well be more acceptable to some local residents (one of whom quoted the scheme on the BHCC Planning Home Page as an example!). The response was two-fold:

- lower rise buildings would substantially reduce the contribution which the site could make to both meeting the city's urgent housing needs and the policy requirement for space for 540 jobs;
- a high density mixed use medium-rise scheme delivering reduced levels of housing and jobs would have minimal public space between buildings, whereas the delivery of high density by high rise buildings creates the opportunity for the provision of the significant, well designed and landscaped public realm between the buildings which is a very positive feature of the project

By comparison it is clear that a much more important issue for most local residents is the potential impact of increased vehicular traffic and overspill parking. Almost all the objections raised this issue which is dealt with in Section 8 below.

6. MAYFIELD CARE HOMES

The provision of 260 extra care homes is a welcome addition to local housing for the elderly. Inevitably the local concentration of a number of elderly people with increasing care needs will give rise to additional strain on already over-stretched social services. Eligibility criteria for the purchasers of the

homes have not been spelled out so it is to be hoped that local liaison will overcome the risk of conflict between Mayfields' care needs assessments and those made by the local social services.

The Health and Wellbeing Centre will support but will not be a substitute for the NHS primary care services necessary to meet the needs of the elderly residents. Following the recent closure of the Hove Park Villas Surgery the nearest primary care services are well south of the railway line at the bottom of Goldstone Villas. An additional 260 plus elderly residents with social care needs and limited mobility will place significant health care demands on local primary care services already struggling to recruit the required clinical staff.

The Planning Committee needs to be informed of the steps the Council will take to ensure that NHS provision for the care of Mayfield Care Homes residents does not further reduce the services provided to existing residents.

Mayfield have pointed to the fact that people selling larger properties and purchasing a care community property will release family housing. However, given the attractiveness of the location and the operation of the housing market in the south-east the Forum is concerned that the properties may well be sold to purchasers currently living well away from Hove - thus the project may have limited positive impact on the city's housing needs.

In this context it would be appropriate for the Council to request Mayfield to develop a marketing policy which gives priority to purchasers who live in the city.

7. COMMUNITY FACILITIES AND INFRASTRUCTURE

The MODA team stressed that, as the long term owner and manager of their development with over 60 staff on site, they would be uniquely positioned, compared with a standard build for sale/rent private developer, to establish themselves as 'good neighbours'. In this context it will be important for a clearly identified proportion of the S106 contributions to be directed to investment which benefits residents living close to the development.

Thus the Forum emphasized, and MODA accepted, the need for maximum feasible public access to the new community facilities within the development, together with MODA support for the enhancement of existing nearby community facilities.

7.1 PUBLIC ACCESS TO MODA - MAYFIELD FACILITIES

The Forum welcomes the fact that the new neighbourhood will not be a gated development. It will be a safe neighbourhood, with 24 hours, 7 days a week estate management and concierge services. It will be fully accessible for local residents, who will share the benefits of the pedestrian friendly new streets (with their café/restaurant and convenience shopping facilities), car clubs and Bike-Share Hub, squares and green public realm, including children's play spaces.

Moreover, the Forum secured a written commitment that the on-site amenities of a village hall, community rooms, library and swimming pool would all be available, free of charge, to members of the public at specific times of the day.

In addition, the health and well-being facility, the gymnasium and the co-working accommodation would be available to members of the public on a membership basis at competitive rates. MODA

envisage co-operating with local stakeholder organisations to deliver social and community events to ensure that its facilities are widely used.

Overall, the scheme will provide a wide range of community facilities which are not currently locally available and will thus implement the Neighbourhood Plan Policy 14 for Community Hub 4 to be provided in the redevelopment of DA6 north of the railway

7.2 LOCAL INVESTMENT OF S106 DEVELOPER FINANCIAL CONTRIBUTIONS

MODA supports the allocation of significant S106 funds to the local priorities established in the Neighbourhood Plan: enhancing existing community facilities (which will be used by both MODA tenants and existing residents) in areas adjacent to the development, together with tree-planting and investment in public art and signage signifying the area as part of the Hove Station Quarter.. LPA This support is very welcome as it will be seen by the local community as bringing important benefits to the local area. ***Thus the Forum urges the Council to secure significant LOCAL S106 investment***

Community Hub 2 Sackville Road- Conway Street-Clarendon Road

Policy 17 of the Draft Neighbourhood Plan proposes three Community Hubs in the existing residential areas as priority locations for the investment of the 'neighbourhood share' of developer contributions. Community Hub 2 is located across the railway immediately south of the MODA site. MODA residents will need to walk through this area to get to the station, via the steps managed by the Salvation Army community centre and may well wish to use the neighbourhood community facilities provided by the Honeycroft Centre, the Vallance Community Centre the BHCC Children's Centre and St Barnabas Church.

Thus In discussions with MODA the Forum presented the outline ***Community Hub 2 Improvement Project***, which is designed to promote the improvement of the run-down immediate environment of these important community facilities. At our request MODA provided some indicative costings for improvement work and agreed in principle that this project should be supported by their Section 106 contributions. Such provision was included in the Matsim Hove Gardens final S106 Agreement.

The Forum therefore requests the Council to allocate a proportion of the MODA S106 allocation to contribute to the implementation of the public realm component of the Community Hub 2 project. This would enable MODA to bring positive benefits to the local community by implementing Policy 17 of the Draft Neighbourhood Plan

Public realm and landscaping

The proposed landscaping scheme is excellent overall, as a fundamental and integral part of the overall design. The Forum particularly appreciates the preservation of all the existing trees along Sackville Road. The intensive and well maintained planting across the site, including the planting of over 300 trees Aand the greening of the rooftops, will be critical to soften the impact of the massing of the buildings and to create an attractive neighbourhood environment which will benefit both residents and users of the public space from nearby residential areas. It is understood that this high quality landscaping will be continuously maintained at the high design level as one of the services which MODA will deliver to its tenants.

In this context would be appropriate for the proposed landscaping to be enhanced with public art by becoming an important part of the Hove Civic Sculpture in the City Art trail. The Forum urges the council and the developer to ensure that this is provided for in the S106 agreement.

It would also be appropriate for the Council to require S106 funding for the provision of street trees in nearby neighbourhoods, where such an initiative has the support of residents. This would build on the experience of such provision elsewhere in the Neighbourhood Plan area (including Marmion Road and Portland Road), initiated by the Civic Trust working with residents.

Such provision for public art and on street tree planting would significantly contribute to the implementation of Neighbourhood Plan Policy 10 Design and Public Realm

8. THE IMPACT OF INCREASED VEHICULAR TRAFFIC ON THE LOCAL ROAD NETWORKS

The development is designed to minimise the vehicular traffic generated by the very high density development of a major brownfield site. The projected low level of car ownership of renters (compared to home owners) combined with no access to off-site parking in neighbourhood streets are key features of the proposal.

Nonetheless, the prospect of overspill parking from the development and worsening of traffic conditions on already congested local roads, particularly at the Shoreham Road- Sackville Road junction, are the two related issues which most concern local residents and have generated by far the most objections to the application.

8.1 ON-SITE PARKING PROVISION AND TRIP GENERATION

On-site parking is provided at level of approximately 1 space per 3 units of accommodation – a total of 268 spaces. This relatively low level is part of MODA's sustainable transport approach, which is designed to minimize the generation of car trips in and out of the development by reducing the reliance on car travel, through promoting the use of excellent local public transport facilities and providing full support for travel by bike and on foot. A higher level of on-site provision would simply increase the traffic generated by the scheme.

This approach is consistent with Neighbourhood Plan Policy 16 Parking and Movement, which supports development that is as close as possible to being car-free, thus generating minimum carbon emissions and air pollution in a new Hove Station Quarter which aspires to become carbon neutral.

The Forum acknowledges that the provision of rented homes will bring newcomers with lower levels of car ownership than home owners and thus generate far less traffic than high density development of owner-occupied homes.

MODA has also informed us that when their limited car parking spaces have been fully allocated prospective tenants will be told that they will not be able to park on site nor will they be eligible for on-street parking in nearby streets (see MODA believes that those for whom car travel is very important for their life-style will simply not take up a tenancy, whilst others will not own cars but use cars available from the car clubs which MODA will provide.

Moreover, the Forum understands that MODA have indicated their willingness that they will fully implement a comprehensive Travel Plan will be agreed with the Council and would also include measures to minimise car use such as providing residents with

- subsidized tickets/memberships for local public transport, BHCC Bike Share and Enterprise Car Clubs; and
- facilities to maximize cycle use - such as cyclist training, cycle maintenance facilities and a bicycle user group providing 'bike buddy' services and organising social rides - which nearby residents could access as part of the MODA-Mayfield 'good neighbour' offer.

Nonetheless, the proposal will increase vehicular movement into and out of Sackville Road, opposite Poynter Road and close to the junction between Sackville Road and Old Shoreham Road. In the longer term this traffic will be reduced as and when a Poynter Road – Newtown Road connection is built, together with a new footbridge connection to the station, as proposed in the Hove Station Quarter Concept Plan.

It is therefore essential that Council transport planners assure the Planning Committees and local residents that the high density development of the site, with its relatively low level of traffic generation, will not cause an unacceptable increase in delays at the Sackville Road-Shoreham Road junction.

8.2 OVERSPILL PARKING

Relatively low levels of on-site car parking generates concerns about the prospect of overspill parking. The Forum is well aware of the serious and legitimate concerns of local residents in the Poets Corner, Artists' Quarter, Orchards and Fonthill Road areas. The suggestion by MODA transport consultants that there is significant unused parking capacity in nearby streets is simply not credible. It contradicts the day to day experience of residents. Moreover, residents fully aware that any very limited identifiable 'spare capacity' is being progressively taken up by the ongoing conversion of large Victorian villas into flats.

The Forum has made clear to MODA that it is essential that the development should not generate overspill car parking, as this would be the antithesis of the 'good neighbour role' to which MODA aspires.

MODA and Mayfield have assured us that they will make it clear to prospective occupiers that they would not be offered, or qualify for residents' parking permits offsite in nearby streets within existing and any future Controlled Parking Zones (CPZs),

This commitment must be delivered by the Council imposing a legally binding condition, such as that recently imposed by the government Planning Inspector when he approved the Matsim Hove Garden (Conway-Ellen Street) development on appeal.

'Within six months of commencement of the development hereby permitted, a scheme shall be submitted to the Local Planning Authority for approval in writing to provide that the residents of the development, other than those with disabilities who are blue badge holders, have no entitlement to a resident's parking permit. the approved scheme shall be implemented before occupation' (appeal decision schedule of conditions para 30)

Further action

The Forum fully agrees with the local residents who argue that further action will be essential to develop and enforce an effective parking management scheme which would eliminate overspill parking. The council must consult as soon as possible on changes which include

- extending restricted parking restrictions in the existing neighbouring CPZs from 8pm to 10pm
- reducing the opportunities to pay for a parking space within a CPZ
- creating a new CPZ which would include the whole of the DA6 area north of the railway between Newtown Road and Sackville Road, together with the Orchard neighbourhood on the north side of the Shoreham Road.

MODA and Mayfield have assured the Forum in writing that they will support these measures to avoid generating overspill parking, They are willing to contribute to the cost of implementing a comprehensive scheme parking management scheme for their site and all the neighbouring streets potentially affected by their development, via their Section 106 developer contributions.

Cumulative impact of the Council planning policies for the development of Hove

Moreover, the Committee should be made fully aware of growing public concern about the potential cumulative traffic impact of the implementation of Hove Station Development Area 6, in the context of the development of the Toad's Hole Valley Development Area 7 and eventually, King Alfreds.

These strategic major projects are all moving forward over the next 5 years on the major north-south axis through Hove. There is clearly an urgent need to minimise additional traffic generation from these major developments and for a review of traffic management provisions for the whole of the Hove area which will be significantly affected by these three strategic developments.

This issue must be fully taken on board as the Council updates its Transport Strategy in the context the Climate Change Emergency and its commitment to carbon neutrality by 2030.

9. CONCLUSION

This major and strategic brownfield site with its excellent access to public transport should be redeveloped to the highest density which is consistent with the creation of a sustainable 21st century neighbourhood, which has minimum dependency on car transport and contributes to the emergence of a carbon neutral Hove Station Quarter, whilst providing an acceptable balance of negative and positive neighbourhood impacts.

The MODA proposal will make a major contribution to city's housing supply when compared with other possible, more conventional, private sector development scenarios led by the construction of owner-occupied housing. In doing so it will go a long way to realizing the overall vision and strategic objectives of the Hove Station Neighbourhood Plan, with MODA as a stakeholder in the ongoing process of creating a 21st century neighbourhood as an important component of a diverse Hove Station Quarter.

In this context, the Forum is clear that the proportion of 'affordable' new homes must be as high as possible. But the fact is that the higher this proportion the lower the price the landowner receives for selling the land and/or the lower the profit the developer receives. The harsh reality is that the changes in the planning system since 2010 have favoured development interests and weakened the powers of

local planning authorities to influence the operation of the land and property markets. This is why the proportion of affordable housing in this case is effectively determined by the Coal Pension Properties Limited acting on behalf of retired coal miners, and why, unless it can be persuaded to be more generous, 10 % will be the highest possible level for the MODA development.

This is not a sensible way to go about providing affordable housing, which should be provided by local councils building genuinely affordable social rented housing. But government policy is that most affordable housing must be provided through the planning process.

Nonetheless BHCC has been allowed to develop a programme to deliver some 500 plus homes, using Council funds, to be allocated to low income households at genuinely affordable rents. The council owns significant land in the Conway Street area, which can be used to provide social rented housing. The Neighbourhood Plan policy is that social housing should be included in the comprehensive redevelopment of the area and will be pressing the Council to use some of its land to achieve just that.

By comparison the Council has much stronger powers to deal with the traffic and parking impacts of the MODA development. BHCC transport planners have not objected to the development as they are now satisfied that the mitigation measures they have secured in their negotiations will avoid significant and disruptive additional traffic flows through the Shoreham Road – Sackville Road junction. The Forum and the Council can do nothing but hope that they are right. We do not have access to the computer modelling which underpins this judgement.

But we are now pressing for the Council to give a high priority to preventing overspill parking in Poets Corner, the Artists' Quarter, the Orchards and the Fonthill Road areas. Moreover, through our negotiations with BHCC officers to finalise the Neighbourhood Plan's transport policies we are also pressing the Council for an urgent review of traffic management policies to take account of the cumulative impact of both the further development projects in the pipeline for the Hove Station Quarter and the likely impact of the Toads Hole development and the eventual redevelopment of the King Alfreds site.

The overall conclusion is that, within the constraints of existing planning law and national planning policies, both the Council and the Forum have no real choice but to pragmatically accept that the MODA proposal is the best possible deal for the urgently needed and long awaited redevelopment of the largest remaining brownfield site in the city.