

Planning application BH2018/03356 KAP Peugeot, Newtown Road

Summary

The Hove Station Neighbourhood Forum supports the principle of a mixed-use redevelopment of the KAP site, but **OBJECTS** to this application, on the grounds of **OVER-DEVELOPMENT**, which includes unacceptably high 8 and 11 storey blocks, and very limited provision of 'affordable' housing. However, the project includes many of the features of an appropriate mixed use development which should be included in a revised submission.

1. The Draft Hove Station Neighbourhood Plan and the KAP application.

The Forum was authorized by the City Council in December 2014 to prepare a statutory Neighbourhood Plan (NP) for an area which focuses on the City Plan Hove Station Development Area 6 (DA6), and includes this site. The Plan aims to guide the comprehensive redevelopment of the run down areas around the station so that it creates a new Hove Station Quarter, which will straddle the railway, and bring positive benefits for current residents, whilst minimizing adverse impacts of large scale redevelopment which helps to meet the city's urgent need for housing and employment space.

The Forum's preparation of the Hove Station Neighbourhood Plan, which includes this site, has now reached the stage of a published Regulation 14 Pre-Submission Draft Plan for public consultation from March 23rd to May 15th. Therefore the applicant's statement that the NP '...is currently in the early stage of preparation' (Planning Statement para 5.42) is significantly out of date. Nonetheless, it is still the case that the Draft Plan is not yet a part of the City's Development Plan and thus, in strictly legal terms, the applicant can state that 'it carries no weight in the determination of the application'.

But the Draft Plan has emerged from an unprecedented level of community engagement, sustained over four years, which identified residents' concerns about redevelopment and support for its emerging policies. This has included 8 Have Your Say Days (average 70 residents attending), many smaller group meetings with local stakeholder organisations, newsletters and the development of a web-site with associated social media platforms - www.hovestationforum.co.uk. This participatory process has shaped this submission and the 240 Forum members were consulted on the draft text.

Thus the Forum's submission should carry significant weight, as it articulates the local community's view of the KAP proposal.

2. The Hove Station Quarter Concept Plan and the KAP application

In February 2018 the official Design Review Panel considered the initial project design on behalf of the Council and its report gave the project consultants the following advice;

Although the Neighbourhood Plan has not yet been adopted we suggest that there is a wealth of research and information provided that could help inform how this scheme could better respond to the wider area and that reference to this could be beneficial (Planning Statement Appendix 1 pp 3/4)

The 'research and information' referred was the draft Neighbourhood Plan, available on the Forum website, which includes the Hove Station Quarter Concept Plan, developed to illustrate how the vision of the wider area of a Hove Station Quarter could be delivered. The applicant refers to this as a '...speculative Master Plan strategy' (Design and Access Statement para 3.1). But having dismissed the Draft Plan as having 'no weight' the applicant then explains (para 3.2) the 'pointers from the Hove Station Masterplan' which they took to '... at least inform some elements' of their design.

The Forum welcomes the fact that the consultants eventually took key design elements from the Concept Plan, including high quality public open space and the pedestrian routes and links which create pedestrian friendly environment. These elements help to join up their proposal with neighbouring existing and possible future housing.

Unfortunately, the applicant used an early and out of date version of the Concept Plan to justify the location of a 'signature height building' in the north-west corner of their site. Informed by our on-going community engagement work (including the July 2018 Have Your Say Day which the KAP did not attend) the current July 2018 version of the Concept Plan reduced the number of signature buildings to two – one at each of the entrance points to the Concept Plan Area - at the Old Shoreham Road and Fonthill Road junctions with Newtown Road,

Thus the Concept Plan included in the current Regulation 14 Consultation Draft Plan cannot be used as a justification for including a very high signature building within the KAP project.

3. Building height, scale and design

The Council informed the applicant that this site had been identified as having the capacity to deliver 60 residential units as part of a mixed use scheme. But they state that

'the submitted proposals demonstrate that the site is capable of delivering a significantly greater quantum of development without having a detrimental effect upon the surrounding area or upon neighbouring amenity'(Planning Statement (para 6.14)

The Forum and the local residents reject this assertion. The 'greater quantum' of 148 residential units and 1,107 sqm of office floor space on a small 0.4 hectare site is **substantial over-development which will have serious detrimental impacts on the character and amenity of the adjacent New Wave development and neighbouring streets to the east.**

A great majority of the 45 objectors to the scheme to date have voiced this concern, including the ward Cllr. Vanessa Brown. Only one respondent has supported the application.

The location of the 11 storey building is not suitable for a signature high building. Although it is the furthest away from nearby residential properties this building will stick up like the proverbial sore thumb, when viewed from both the four storey housing in Goldstone Lane and the 3-4 storey housing up the hill to the east in Fonthill Road and also when viewed from Hove Park.

To varying degrees it will have significant negative impacts on the daylight and privacy currently enjoyed by longstanding neighbouring residents and the (as yet mainly prospective) occupants of the adjacent recently constructed New Wave development. Moreover it will hugely overshadow and visually dominate any future redevelopment of the adjacent Goldstone Retail Park, such as that which is

illustrated in our Concept Plan. It is for these reasons that this location is inappropriate for a landmark building.

The proposed 8 storey block will also have these negative impacts, albeit to a lesser extent. This block will be much taller than the adjacent 6 storey New Wave development. The 6 storey limit was imposed by the Council Planning Committee to align the New Wave block with the height of the adjacent former church building and should be regarded as a precedent. This decision informed the development of the Draft Neighbourhood Plan Tall Buildings Policy 11 which states

In the DA6 part of the Neighbourhood Plan Area, building heights will generally be limited to six storeys with the following exceptions. To the north of the railway taller buildings may be acceptable with in locations that allow them to act as Hove Station Quarter landmarks and aid wayfinding. Potential locations include the junctions of Shoreham Road/Newtown Road and the south eastern part of the area closest to the railway.

Reducing the height and bulk of the two big blocks would significantly improve the design quality of the development by enabling the evolving Newtown streetscape to be less overbearing and much more coherent and attractive, whilst minimizing its negative impacts.

Thus the Council should require the 8 storey block to be reduced to 6 storeys and the 11 storey block to be reduced to 9 storeys.

4. Affordable Housing

The Draft Neighbourhood Plan adopts the City Plan target of securing 40% 'affordable' housing in all developments of more than 15 dwelling units. This has been fully supported in all our community engagement work. But local residents have increasingly voiced their dismay that the government imposes a definition of 'affordable' as 80% of market rent or sale price. They point to the New Wave development as an example of housing provision which attract purchasers from outside the city, be they commuters or second home owners and thus does very little, if anything, to meet local housing needs. T

The proposed provision of 22% of affordable housing in the form of shared ownership is not compliant with Council policy and therefore not acceptable to the Forum.

The applicant commissioned a viability assessment which demonstrated that the project is not financially viable, even at 0% affordable housing provision But

'..in order to achieve a satisfactory planning permission.....the applicant has agreed to offer a degree of affordable housing. The applicant already owns the site and therefore is able to agree a reduced return from the development which would allow for the provision of 32 affordable units on site' (Planning Statement para 3.13)

The statement goes on to say that more affordable housing could be provided by one of two options - reducing the office space or increasing the amount of development on site. But as the Council would not support either option, the proposed project 'appears to be a suitable compromise between the various competing interests' (para 3.14).

But shared ownership is the version of 'affordable' housing which is nearest to full market value. So the 'reduced return' (meaning the reduced profitability of the project) is very modest. A third option of a further reduction in the return would deliver more 'affordable' housing and be a better compromise in terms of housing provision.

Thus the Council should require the developer to deliver 40% 'affordable' shared ownership properties to meet the target of both the City Plan and the Draft Neighbourhood Plan.

5. Employment space and jobs

The proposal includes the provision of 1,107 sqm of office space located in the ground floor of the two big blocks, thus creating 'an active frontage' - i.e. people moving in and out of the buildings and using the park/café. This is slightly less than the existing office space, but will have the capacity (assessed by using the national standard of 85 sqm per employee) to provide 140 jobs on site compared with the current 25 jobs.

This approach is fully supported as it is consistent with that which Forum representatives have taken with council officers during the development of the Draft Plan proposals for mixed use sites i.e. the balance between employment space and space for housing provision in mixed use development in DA6 should be determined by job creation capacity, rather than simply by the quantity of employment space.

6. Traffic generation

The applicant provides technical evidence to support the proposition that the additional traffic generated by this development will have no adverse impacts. However, this does not take full account of the impact of the traffic it will generate in combination with that now being generated by the New Wave development.

This combined impact will worsen the already stressful everyday experience of pedestrians, cyclists and motorists at the uncontrolled junction of Fonthill Road and Newtown Road. The inadequacy of the current design of this junction is demonstrated the frequency with which the traffic bollards are destroyed by cars.

The technical appraisal of this application by council officers should assess the combined impact of the New Wave development and this proposal and establish whether or not there will be a need to improve this already dangerous junction.

Furthermore, this assessment should be part of a wider assessment by the Council of the combined impact on traffic movement on the local road network (especially the Sackville Road/Old Shoreham Road junction) of the New Wave development (65 dwellings) and the KAP proposal, the recently approved Hove Gardens project in Conway Street (188 dwellings), the currently proposed Sackville Trading Estate/Goods Yard development (some 600 apartment units plus a 200 unit care facility) and the major Toads Hole development (some 700 dwelling units).

7. Parking provision

The basement car will provide 93 car parking spaces and 238 cycle spaces for the occupants of 148 dwellings and the anticipated 140 workers in the new office jobs. The provision of cycle spaces is generous and welcome as it anticipates and will help to promote the increase in cycling which the Neighbourhood Plan aims to achieve over the next few years as the new Hove Station emerges.

However, the project is outside the Council's car parking zones (CPZs). In the continued absence of parking control, this level of on-site parking provision will inevitably increase overspill on-street parking in Newtown Road and the narrow Goldstone Lane.

This adverse impact of the project should be minimized by Council including the Newtown Road area in a CPZ and refusing on street parking permits for the occupants of the new dwellings and the employees of the new businesses.

Additionally, given the proximity of public transport options at Hove Station the Council should also impose a planning condition which requires office employers to require their employees, by employment contract, to travel to work by public transport, or by cycling or walking .

8. Community Engagement

In preparing a statutory Neighbourhood Plan the Forum is required to engage with landowners and developers to ensure that residents' concerns, ideas and priorities are fully taken account of.

Thus when Matsim submitted their Hove Gardens project the Forum's Technical Team had a series of joint meetings with Matsim's consultants and their evolving scheme was presented at two of our Have Your Say Days, attended by a total of 170 local residents. As a result their final planning application included substantial improvements to Conway Street east of Fonthill Road and this very high profile project generated only 23 objections. Moreover, Matsim agreed to express support for our proposal that some of their Section 106 funds they have to pay to the Council are invested in improve the Honeycroft and Vallance Centre Community facilities. The Forum has had a similar joint working arrangement with MODA as their proposals for the regeneration of the Sackville Trading Estate/Goods Yard have evolved since June 2018.

In sharp contrast, the Forum has had much less success in engaging with the KAP consultants. Our team had a joint introductory meeting and individual members participated in the informal discussions at their two public exhibitions in May and June which attracted 14 and 30 attendees respectively (KAP Community Engagement Statement). But the KAP team were not able to participate in our July 2018 Have Your Say Day.

In the context of increasing concerns about the final proposed scheme being voiced by our members and their neighbours, the Forum wrote to KAP in early February asking for a joint team meeting on the final proposal. But this has yet to happen. We recently re-iterated this request and invited KAP to participate in our next Have Your Say Day on March 23rd. To date there has been no response. Yet the Community Engagement Statement submitted with the planning application states that

'Tudor Holding is committed to engaging with the local community and, following the submission of the application, will ensure that interested parties and key stakeholders remain informed and updated regarding the proposals'

Rather than delivering on this commitment the evidence is that KAP are continuing with their minimalist and token approach to engaging with the local community. A revised proposal should be developed through a process which includes effective engagement with the local community.

8. Conclusion

For the reasons set out above, the Hove Station Neighbourhood Forum requests the Council to **refuse** this application.

However the early mixed-use redevelopment of the site would make a significant contribution to meeting the city's housing needs and to the delivery of the Neighbourhood Plan vision of a joined up and vibrant mixed use Hove Station Quarter.

Thus the Forum would welcome the opportunity to work with the applicants to develop a revised project which would have the support of the local community.

Such a revision would include a reduction in the density of the development and the height of the blocks, provide a higher proportion of 'affordable' housing, and include improved proposals for dealing with traffic and parking, whilst maintaining the provision of office space, a public park and high quality landscaping in a pedestrian friendly environment.