

**Hove Park Neighbourhood Forum's Preferred Option for
Resolving the Overlap in the Areas**

Hove Park Neighbourhood Forum

145 Nevill Road,
Hove.
BN3 7QE

Martin Randall, Esq.,
Head of Planning,
Brighton and Hove City Council,
Town Hall,
Norton Road,
Hove.
BN3 3BQ

24th June 2014

Dear Sir,

Proposed Hove Park Neighbourhood Forum Application

I enclose our views and response to the matters raised at the meeting of 2nd June held at Hove Town Hall and your subsequent email regarding suggested options to be considered in resolving the overlap of the two forum applications.

I look forward to hearing from you in due course regarding the outcome.

Yours faithfully,



Colin Hancox
Chairman of the Proposed Hove Park Forum

copied to Rob Fraser

25 June 2014

Hove Park Neighbourhood Forum (HPNF)

Response to the proposed Options to the Hove Station and Hove Park Neighbourhood Forum Areas

Introductory statement

This paper responds to the Council's request for the Hove Park Neighbourhood Forum to make a case for the proposed boundaries of the area it proposes to cover and comments on the boundary options discussed at the meeting at the Council Offices on June 2, and as subsequently issued to us by the Council.

We confirm that we would be prepared to have further discussions with representatives of the Hove Station Forum, but do not consider that this is possible within the timescale of responding to the proposed Options to meet the date of June 27 proposed by the Council, nor appropriate until the issue of questionable consultation procedure on the part of the Hove Station Forum raised in our letter of 17 June 2014 to the City Planning Officer, has been reviewed by the City Solicitor and a response to our letter received.

As a general comment on the public consultation situation we confirm that we consulted fully within the boundaries of the proposed Hove Park Area and about 400 separate letters of objection to the Hove Station Forum's proposals were written by residents in the Hove Park Ward area, whereas we believe that the majority of the objections to the Hove Park proposals used a pro-forma questionnaire as the basis for collecting signatures.

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1. **Deciding an Area – Government Guidance**

“In deciding areas, the Council should have regard to the National Planning Practice Guidance”

<http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/designating-a-neighbourhood-area/>

This planning guidance sets out eight considerations for deciding suitable boundaries of a neighbourhood area.

2. **The eight considerations**

Each of these considerations is discussed below in relation to the proposed boundaries of the HPNF.

2.1 **village or settlement boundaries, which could reflect areas of planned expansion**

The boundary selected for the HPNF reflects the well defined and understood Hove Park Ward boundaries and relates clearly to the demarcation lines of the two Ward Councillors’ responsibilities.

Residents identify geographically with those appointed to represent their views.

Both Ward Councillors are leading members of the HPNF. That is a vitally important factor in any decision relating to the definition of preferred boundaries for a Neighbourhood Forum.

2.2 **the catchment area for walking to local services such as shops, primary schools, doctors’ surgery, parks or other facilities**

The proposed HPNF Area includes a wide range of facilities, all within walking distance and regularly used by residents living within the area. Some facilities, such as the larger retail outlets, Hove Park and Hove Recreation Ground, and the local secondary schools of Hove Park and Blatchington Mill, serve a wider civic need as well as the needs of local residents.

Shops

Retail facilities which serve a wider role within the Brighton and Hove Area are:

- Waitrose Supermarket is within walking distance of Nevill Road, Nevill Ave., roads off Nevill Rd., Goldstone Crescent, Woodland Drive, Chartfield, Orchard Rd/Avenue.
- Goldstone Retail Park – accessible on foot from the area around Hove Park and east of Sackville Road.

- Sackville Road Trading Estate, accessible on foot from the area around Hove Park and the area east of Sackville Road.

Local shops serving the residential areas within the HPNF and within easy walking distance of the surrounding residential areas are:

- Court Farm Road shops serving the areas of Court Farm Road, Nevill Rd., Goldstone Way, Nevill Way, and Goldstone Crescent.
- Woodland Drive Parade serving Woodland Drive, Deanway, Benett Avenue, Hill Drive, Downside, Shirley Drive, Shirley Avenue, Tongdean Road.
- Queen Victoria Avenue Parade serving the areas bounded by King George VI Avenue, Woodland Avenue & Goldstone Crescent.
- Droveaway Tesco from the area bounded by Dyke Road, Tredcroft Road & Hove Park Road.
- Old Shoreham Road shops (both north and south sides). These are accessible on foot from the area around Hove Park and east of Sackville Road. These shops are also the local shops for the Artist's Corner and Amherst Crescent Areas to the south of Old Shoreham Road.

Primary School

There is a shortage of primary schools in the area. The only primary school within the proposed HPNF is:

- Aldrington School, Eridge Road serving the area bounded by Old Shoreham Rd, Holmes Ave, Goldstone Crescent and feeder roads from Goldstone Crescent.

This school is beyond reasonable walking distance for small children for most of the HPNF Area, which is one of the issues the future HPNF will need to address. It is particularly galling that Planning Approval has recently been granted for the Bi-Lingual School adjacent to Hove Park (which will take most of its pupils from a much wider area rather than residents of the Hove Park area), as this site was one of the very few sites in the area which could have been used for a new Primary School to meet local needs.

Doctors Surgery

There is one Surgery within the Area:

- The Surgery, Onslow Rd serving the area bounded by Dyke Rd, Hove Park Rd, Goldstone Crescent, and Tredcroft Rd

The Hove Polyclinic and Mill View Hospital lie just outside the western boundary of the area, but are within walking distance of many residents.

Parks

The area contains a number of parks. Three of these, particularly Hove Park, serve a wider area of the City as well as the residential areas within the proposed HPNF. Over the proposed Forum area as a whole, at least one of these parks is within walking distance of local residents.

The parks are:

- Hove Park from area bounded by the railway line, Dyke Road, King George VI Avenue & Holmes Avenue.
- Hove Recreation Ground which is within easy walking distance of Old Shoreham Road, Goldstone Crescent, The Droveaway & Dyke Road.
- Dyke Road Park bounded by Dyke Road, Old Shoreham Road & Radinden Manor Road.
- Three Cornered Copse from Nevill Road, Goldstone Crescent, Woodland Avenue, Woodland Drive and Dyke Road Avenue. This area of woodland is much used by local residents.

Other facilities

- Hove Engineerium
- The Weald Allotments at Nevill Avenue, bounded by Nevill Avenue, Old Shoreham Road & Holmes Avenue.
- North Nevill Allotments, bounded by Nevill Road, Nevill Avenue and Holmes Avenue. There are well over 500 allotment holders, and the vast majority live in the local area.
- Blatchington Mill and Hove Park schools and playing fields.

2.3 the area where formal or informal networks of community based groups operate

- The Hove Park Ward area includes many community based groups. The Ward's two councillors are active members of Hove Park Neighbourhood Forum as well as serving the wider community. The leading community organisations are:
 - Goldstone Valley Residents' Association's area bounded by the junction of Nevill Rd and Woodland Drive, Nevill Road, King George VI Avenue and Woodland Avenue.
The Association has a membership of 900 householders and issues a monthly news sheet to all members.

- Hove Park Residents' Association draws its members from the area bounded by Old Shoreham Road, Goldstone Crescent and Dyke Road. This Association regularly issues news sheets in the area.
- Woodland Drive Action Committee
- Friends of Hove Park
- Friends of the Three Cornered Copse
- Barrowfield Resident's Association

All these groups have confirmed their support for the aims of the HPNF, and see it as a method by which they can participate in the planning of the area. Other community groups or organisations within the Area are:

- Bishop Hannington Church bounded by Old Shoreham Road, Nevill Avenue, Holmes Avenue.
- Corals Fitness Centre, bounded by Old Shoreham Road, Holmes Avenue & Goldstone Crescent
- Pavilion & Avenue Tennis Club, area bounded by Dyke Road, Hove Park Road, & Woodruff Avenue.
- BHASVIC area bounded by Dyke Road, Old Shoreham Road and Radinden Manor Road.
- Blatchington Mill School area bounded by Nevill Road, Nevill Avenue & Holmes Avenue.
- Cardinal Newman School area bounded by Old Shoreham Road, Dyke Road & Radinden Manor Road.
- Hove Park School bounded by the railway line, Holmes Avenue & Goldstone Crescent.
- Brighton & Hove High School, Radinden Manor Road bounded by Old Shoreham Road, Dyke Road and Shirley Drive.

In addition, the Hove Park Membership is widely and evenly distributed throughout the proposed HPNF Area, including many members living within the disputed residential areas of Artist's Corner and Amherst Crescent – refer to the Membership Distribution map attached. A list of HPNF members will be forwarded separately.

2.4 the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style

The topography of the proposed HPNF area is generally sloping, quite steeply from the higher areas towards the northern point at the top of Dyke Road, and more gently from the west down into Goldstone Valley. In the

lower half of the valley, surrounded on three sides by residential areas, lies Hove Park.

Most of the proposed Area of the HPNF is relatively low density residential, mostly consisting of two-storey detached or semi-detached houses, ranging from medium size to large, generally built in the mid - late 1930s, many in typical suburban style with bay windows, plain tiled pitched roofs, the majority in suburban "Arts and Crafts derived" style.

The larger detached houses tend to be located on the upper slopes of the area towards Dyke Road. There are three or four relatively isolated blocks of flats within the area, including the development at 1 Hove Park which is currently under construction.

The road layouts are informally laid out, and tend to bend and curve in response to the contours of the sloping land above Goldstone Valley, quite unlike the older areas of Hove on the flatter land to the south which are based on a grid layout.

Most properties are owner-occupied, though there is a small proportion of rented houses and flats. Some of the larger houses have been converted into flats.

Most properties have sizeable front gardens and driveways, which provide off-street car parking, unlike the older residential areas generally to the south of the proposed HPNF where on-street parking is the only option.

The overall character can be summarized as 'suburban' and low density. It is quite different in character to the higher density areas of Hove to the south of the railway line, where the houses are of an earlier period and tend to be mainly terraced and with no off-street parking.

There are two small areas of older housing within the Ward boundaries - Artist's Corner, and Amherst Crescent. Though these are of slightly earlier construction than the suburban areas north of the Old Shoreham Road, they are physically separated by the natural boundary of the railway line from the older terraced housing of Poet's Corner and Aldrington to the South. They therefore have a more natural and accessible relationship to Old Shoreham Road and its local shops, than to the areas South of the railway line.

2.5 whether the area forms all or part of a coherent estate either for businesses or residents.

The HPNF area is a mixed use area containing substantial commercial uses as well as the large housing areas described in para 2.4 above. All of these commercial areas are located towards the southern edges of the proposed neighbourhood area.

There are six distinct commercial areas:

- the Hove Park offices overlooking Hove Park

- the eastern side of Nevill Road which includes the Waitrose superstore and the greyhound stadium.
- A small area along the north side of Old Shoreham Road just east of Nevill Road.
- The retail park on the former football ground on Old Shoreham Road and Newtown Road up to the natural boundary formed by the railway line.
- the eastern side of Sackville Road extending south as far as the railway line. The majority of this is comprised of the Sackville Trading Estate, which has Planning Approval for a mixed commercial/residential development.
- the St Joseph's Close commercial area on the south side of the Old Shoreham Road west of Sackville Road which includes the Homebase and Currys stores.

In addition to these commercial uses there are small areas of local shops located within the residential areas.

There is no question that most of these commercial areas serve a wider role and function within the City than purely serving the neighbourhood, just as Hove Park provides a green lung for the City as a whole. The way in which all these areas are developed in the future has a greater significance in neighbourhood forum terms to residents of the Hove Park Area, rather than to the general population living to the south of the railway line.

2.6 whether the area is wholly or predominantly a business area

The proposed HPNF area is primarily residential, but includes the substantial commercial components described in para 2.5 above. As the commercial areas represent only a relatively small proportion of the mainly residential uses within the HPNF, and are closely integrated in spatial terms with the housing areas adjacent, this consideration does not really apply to the Hove Park area.

It would not make any sense to attempt to separate these areas from the Hove Park Area and attach them to another substantially mixed use area to the south of the boundary formed by the railway line.

2.7 Whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway

The east/west railway line forms a natural southern boundary with access to the southern part of Hove from the proposed HPNF area, limited to two roads beneath the railway bridges in Sackville Rd and Fonthill Rd, and a pedestrian only tunnel in Amherst Crescent.

The railway forms a strong physical and actual boundary between the older more densely populated housing areas to the south of the railway line, and

the mostly later suburban residential areas of mainly semi and detached housing with parks and open spaces to the north,.

Dyke Road defines the north east boundary and is a major commuter road feeding into Hove Park Ward area, leading from the Brighton Bypass to the city. In areas to the north and east of Dyke Road, the housing tends to be of an earlier construction, higher densities and different road patterns.

King George VI Avenue defines part of the western boundary from the open land (Toad's Hole Valley), between it and the A27 Brighton Bypass. The adjacent housing is mainly semi-detached or detached similar to adjacent areas in Goldstone Valley. The road feeds into Hove Park Ward.

The lower eastern boundary of the Hove Park Ward, leads from King George VI Ave/Hangleton Rd, through a residential area and linking to Old Shoreham Rd and access to two railway stations along the western sides of the Blatchington School playing fields and the Allotment Gardens adjacent to Holmes Avenue. The edge of these large open spaces clearly define the boundary of the proposed forum area at this point.

2.8 the natural setting or features in an area

The topography of the area was discussed above in para 2.4. The higher areas to the north and west overlook and are linked by a loose network of roads leading down to Hove Park, and the area beyond the Old Shoreham Road down to the railway line. This forms a natural southern boundary to the HPNF because of the few points at which the road network crosses it. This gives the area a natural identity and coherence, distinct from the areas south of the railway line and the areas to the east of Dyke Road.

The northern section of the western boundary of the proposed area is clearly defined by King George VI Avenue. South of the intersection of Hangleton Road a natural boundary is less obvious as there are no natural features which define a boundary. The Ward boundary seems therefore to be the sensible point at which to draw the line

2.9 The size of the population (living and working) in the area

The Government Planning Guidance states that electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents.

The population living within the existing Hove Park ward boundary is 10,600, so this would be approaching twice that of the average population referred to in the guidance.

However from experience to date of the size of neighbourhood Forum areas in other parts of the country, there appears to be considerable variation, from some as low as 1,000, to others of 25,000 or more in some densely populated areas of London. It would certainly be fair to say that many urban areas are likely to be well above the average of 5,500.

The population of the proposed Hove Station Forum Area is 17,400. So if the two Areas were to be combined – as proposed by the Hove Station Forum – the total population would be 28,000.

We consider that this would be an impossibly large and cumbersome vehicle to perform efficiently as a Neighbourhood Forum.

3. Other considerations

3.1 Role of Hove Park

Hove Park, surrounded as it is on three sides by the suburban housing around it, acts as a central focus for the whole area and its residents, as well as providing an essential facility for the whole neighbourhood and the City as a whole.

What happens in and around Hove Park in neighbourhood Forum terms, is extremely important to the residents who live in the areas encircling the park. The Park and its immediate surroundings should certainly be included within the area of the Hove Park Neighbourhood Forum. It makes sense for it to be located within the Neighbourhood Area to which it most closely relates, and the one on which the Ward Councillors are represented and actively involved.

4. Argument against the boundaries proposed by the Hove Station Neighbourhood Forum (HSNF)

There appear to be two boundary options proposed by the HSNF.

The first is the boundary shown in its application; it would appear from the comments made by the representatives of the HSNF that they realise that their proposal to extend the HSNF boundary beyond the railway line to include the public open spaces of Hove Park, Hove Recreation Ground, and the allotment areas and school playing fields, together with a narrow strip of the surrounding houses, was a mistake. Rightly, it is not an option included in those put forward by the Council.

Their only alternative suggestion (made at the meeting at Hove Town Hall on June 2), was that the boundaries of both proposed forums should be combined into one encompassing the whole of the areas proposed by both Forums, as shown in Option 1a. As we argued in para 2.9 above, this would result in an impossibly large neighbourhood forum area in population terms.

We recognise that some facilities located within one neighbourhood area have a wider catchment area and can play a wider role in the serving the residents of the City. For example residents in the Hove Park area use shops and facilities elsewhere in Hove, for example in the New Church Road, George Street and Blatchington Road areas. But that is not an argument for including them within the Hove Park Neighbourhood Forum Area. Hove Station Forum seem to think that because residents in its area use Hove Park, it should therefore be included in its area. That is

nonsense as an argument for defining natural neighbourhood forum boundaries.

5. Options put forward by the Council

5.1 Option 1a

This option, as we have indicated above in para 2.9, would result in an impossibly large and cumbersome vehicle to perform efficiently as a Neighbourhood Forum. The total population of the Forum area would be in the order of 28,000 people – far in excess of the average population of 5,500 suggested by the Government guidelines.

It would include housing of different periods, differing layouts, differing densities, and differing social groups, and would score poorly when evaluated against the eight guidelines suggested by the Government.

It would take in the whole of Hove Park Ward, as well as parts of Goldsmid, Central Hove, Westbourne, Wish and Hangleton and Knoll Wards. In terms of identifying with existing electoral boundaries and councillors' responsibilities, it would be likely to result in conflict over development policies between the various parties and councillors, not to mention the diversity of opinion within the constituents of the various wards about future and proposed developments within the proposed 'neighbourhood' area.

5.2 Option 1b

This is the same as Option 1a, except that the small strips of housing within Hangleton and Knoll Ward along Holmes Avenue, Wayfield Avenue and Elm Drive have been removed from the proposed Neighbourhood Area.

Essentially the same criticisms made of Option 1a above also apply to this Option.

5.3 Option 2a

This is based on Option 1b but proposes two separate neighbourhood areas, separated by the Old Shoreham Road.

As stated above in para 2.8, there are two small areas of older housing within the Ward boundaries - Artist's Corner, and Amherst Crescent. Though these are of slightly earlier construction than the suburban areas north of the Old Shoreham Road, they are physically separated by the natural boundary of the railway line from the older terraced housing of Poet's Corner and Aldrington to the South. Each area has a more natural and accessible relationship to Old Shoreham Road and its local shops, than to the areas South of the railway line.

They also form part of Hove Park Ward and the HPNF membership includes many residents who live in these two areas.

We consider that the case for including these areas and the commercial areas adjacent where any future development will directly affect them, is very strong and they should therefore be included within the Hove Park Neighbourhood Area.

5.4 Option 2b

This option proposes that the railway line should form the boundary between the two neighbourhood forum areas, but includes the older more densely developed housing between Fonthill Road and The Upper Drive within the Hove Park Forum area.

This area has more in common in terms of character and access to the housing areas south of the railway. Neither are they within the Hove Park Ward.

Residents in this area are far more likely to be affected by future development in the Hove Station Area, as Fonthill Road would become a primary access route to that area. Indeed some of the proponents of the Hove Station Forum live in the Fonthill Road area, and set up the Hove Station Forum precisely because of those concerns.

We do not think that either the HPNF or the HSNF would support this option.

5.5 Option 2c

This is a variation of Option 2a, but includes the Amherst Crescent housing within the Hove Park Area.

This makes no sense as residents of that area would be most affected by any future development of the St Joseph's Close Trading Estate immediately adjacent, yet they would have no influence on any future development policies or proposals for that area.

5.6 Option 2d

This option resolves the problem identified in Option 2c above, but includes Artist's Corner, the Sackville Trading Estate and the Goldstone Retail Park within the Hove Station Neighbourhood Area.

Firstly, people in Artist's Corner relate to the Hove Park Forum Area, not only because it is included in the Hove Park Ward, but also because the HPNF has a large number of members who live in that area.

So what may happen in the future to both the Sackville Trading Estate and to a lesser extent the Goldstone Retail Park, is of major importance in neighbourhood forum terms to the residents of Artist's Corner – as well of course to residents of the areas surrounding Hove Park.

And what happens on the Sackville Trading Estate has to be considered in relation to the future development of the Goldstone Retail Park and the Newtown Road commercial area. You cannot separate those two. There is no natural, identifiable boundary here.

5.7 Option 2e

This option includes Artist's Corner within the Hove Park Area, but includes the commercial areas of the Sackville Trading Estate, the Goldstone Retail Park and Newtown Road within the Hove Station area.

Our arguments against this option are the same as for Option 2d – the residents of Artist’s Corner are denied influence on what happens on the Sackville Trading Estate.

6. **DA6**

We suspect that Area DA6 of the City Plan has influenced the choice of the options discussed above, because of a perceived view that DA6 should fall entirely within one neighbourhood forum.

We question this assumption on the following grounds:

- DA6 is divided into two distinct areas by the railway line. It is highly unlikely therefore that development on one side of the railway line will have any direct physical connection with development on the opposite side of the tracks.
- Development on each side of the railway will impact far more on the immediately adjacent areas of commercial or residential uses, whether north or south of the line, than on areas the opposite side of the railway tracks, particularly as the part of the railway line where it passes through DA6, is occupied by Hove Station and a wide area occupied by several tracks on the western approaches to the station.

However we do think that it would be desirable to include a provision in the Neighbourhood Plans of both the Hove Station and Hove Park forums to the effect that policies towards, and responses to any major developments proposed within the DA6 area, should be the subject of joint consultations between the two forums.

7. **Option 2f**

We note that there is no Option 2f in the list of Options that we have been asked to comment on.

Option 2f is the Area shown on the Hove Park Neighbourhood Forum application.

It is our preferred Option for the following reasons:

- It reflects the recognised electoral ward boundaries of the Hove Park Ward.
- The proposed HPNF area has a consistent character and identity with well-defined boundaries.
- The population, although higher than the average suggested by the government, is at a manageable level, and a high proportion of the residents are families with children.
- The proposed HPNF area is primarily residential but includes several commercial areas which provide facilities and employment for local residents as well as for the wider city. It is important that Neighbourhood

Forums include a mix of interests and viewpoints in order to create a balanced policy towards the future development of the area.

- The Hove Park Neighbourhood Area includes Hove Park. It is important that the park and its immediate surroundings are included within a strong, representative community based Forum which can protect the interests of all who use the park.
- The HPNF is supported by a wide range of locally based community based groups, including Friends of Hove Park, as well as local residents and commercial organisations.
- The Ward's two councillors are active members of the Forum which provides the proposed Hove Park Forum with a consistent community based representation, identity, authority and responsibility for dealing with local issues many of which of course are concerned with planning issues.
- The Hove Park Forum's membership is several hundred strong (a list of members will be delivered separately), and is widely and evenly distributed throughout the whole area.
- The Hove Park Forum has an approach to managing its role in the community which is inclusive, involves comprehensive and open public consultation, and is highly pro-active in involving its residents in discussion of the issues which affect the Hove Park neighbourhood.

This submission seeks to establish that the proposed Hove Park Forum Area fully complies with the intentions, the spirit and the letter of the legislation set out in the Localism Bill.

It also takes full account of the guidelines relating to the establishment of neighbourhood forums and suitable boundaries, in order to ensure that the proposed HPNF relates well to the natural, physical and electoral boundaries, and accurately reflects the character of a neighbourhood area in visual, topographical and community terms. It also has a remarkably consistent character as a result of its origins during the 1930s, and the suburban form of development characteristic of that and the post-war periods. It also includes within its boundaries a wide and diverse range of commercial uses and important civic facilities such as Hove Park.

Defining suitable boundaries for neighbourhoods within an urban context is not an easy task.

However we consider that the Hove Park Neighbourhood Forum as proposed in our original application will result in it successfully representing a balanced community which already has a well recognised identity with which those who live and work in the area are already familiar.

It is by some margin the best option on the table.

Hove Park Neighbourhood Forum – Membership Distribution Map

The map gives the approximate location of forum members who live and work in the area.

