



SHOREHAM HARBOUR REGENERATION

Western Harbour Arm Development Brief

Consultation Statement and Summary of Amendments

July 2013



1 Introduction

1.01 This statement sets out how Adur District Council has involved the community and stakeholders in the preparation of the Development Brief for the Western Harbour Arm¹ in accordance with the adopted Adur & Worthing Councils Statement of Community Involvement (SCI)².

1.02 The SCI sets out minimum requirements for consultation on Local Development Documents, such as Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).

1.03 Although the development brief does not have the equivalent status of a DPD or an SPD, it will be a material consideration in determining planning applications within the development brief area. As such it was considered necessary and appropriate to adhere to the consultation requirements for an SPD. Appendix 1 shows that the minimum requirements set out in the SCI have been met or exceeded.

1.04 This document sets out:

- Who was consulted
- How and when the public and other stakeholders were consulted

- The main issues raised as a result of the consultation
- How the representations have been taken into account.

¹ *Western Harbour Arm Development Brief* (Shoreham Harbour Regeneration / AMUP: 2013)

² *Adur and Worthing Statement of Community Involvement* (AWC: 2012)

2 Background

- 2.01 The Western Harbour Arm Development Brief forms part of the wider Shoreham Harbour regeneration project. This includes the preparation of a Joint Area Action Plan (JAAP) for the harbour and surrounding areas. The project is being delivered by Shoreham Harbour Regeneration, a partnership comprising Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority.
- 2.02 In May 2012 Shoreham Harbour Regeneration appointed a consultant team (Allies & Morrison Urban Practitioners, SKM and GL Hearn) to prepare development briefs for the Western Harbour Arm (in Adur) and South Portslade Industrial Estate and Aldrington Basin (in Brighton & Hove). The purpose of the briefs is:
- To manage and facilitate change
 - To define land use and design guidance
 - To identify parameters to ensure that development is of the highest quality
 - To highlight key interventions and priority projects
 - To encourage investment and developer interest in the harbour.

3 Consultation

Design Workshop

- 3.01 Allies and Morrison Urban Practitioners facilitated a design workshop at Adur Civic Centre on 16th August 2012 which was attended by 48 people including members and officers of the three partner local authorities, representatives of community and residents' groups and local businesses. The following organisations were represented at the workshop:
- Adur District Council / Adur & Worthing Councils
 - Adur Voluntary Action
 - Allies and Morrison Urban Practitioners
 - Brighton & Hove City Council
 - CityCoast Community Development Group
 - Community Association of Portslade South
 - Friends of Shoreham Beach
 - Hove Business Association
 - Kingsway and West Hove Residents' Association
 - Portslade Community Project
 - RE:GEN
 - Shoreham Beach Residents' Association
 - Shoreham Harbour Regeneration
 - Shoreham Port Authority
 - Shoreham Society
 - Shoreham Slipways Group
 - South Portslade Community Group
 - Western Esplanade Management Company
 - West Sussex County Council
 - Worthing and Adur Chamber of Commerce

- 3.02 The workshop commenced with a summary of the consultant team's initial analysis of the Shoreham Harbour area and preliminary thoughts on the opportunities that had been identified for the key areas of change. After this presentation the attendees split into small groups to develop ideas and feedback on the content of the presentation which included the key issues for the sites, a discussion surrounding strategic themes that had been developed, an identification of guiding principles for new development and finally the key projects that should be prioritised in the harbour.
- 3.03 Maps of the development brief areas were provided for each group to annotate to help identify specific issues in each of the sites. Each group presented their feedback at the end of the workshop.
- 3.04 Key issues emerging at this stage included:
- The relocation of existing businesses and the potential loss of employment
 - Pressure on infrastructure
 - A poor quality environment on the A259
 - The density of new development
 - Flooding
 - A lack of connectivity with surrounding areas
 - The co-location of uncomplimentary uses
 - Neglected sites
 - Concern over a proposal for a new supermarket.

Drop-In Exhibitions

- 3.05 Between 20 and 24 August 2012 landowners, businesses and developers on the Shoreham Harbour consultation databases were invited to attend drop-in exhibitions at Hove Town Hall and Adur Civic Centre. Officers of Shoreham Harbour Regeneration were available to discuss the regeneration project and the progress with the development briefs.
- 3.06 Interested parties were also offered the opportunity of face-to-face meetings with officers of Shoreham Harbour Regeneration and the partner local authorities.

Background and Emerging Proposals Report

- 3.07 Comments and feedback from the design workshop and drop-in exhibitions informed the preparation of an Emerging Proposals Report³. This report was subject to a four week period of informal consultation. The documents were available to view on the Shoreham Harbour Regeneration website, and also at Adur Civic Centre and Hove Town Hall.
- 3.08 Consultation focussed on developers, landowners, local businesses, and members and officers of the partner authorities and community and residents' groups.

³ *Shoreham Harbour Development Briefs: Background and Emerging Proposals Report* (AMUP: 2012)

3.09 The following organisations submitted representations on the report:

- A2 Arts Academy
- Adur District Council (Planning Policy)
- Adur & Worthing Councils (Environmental Health)
- Brighton & Newhaven Fish Sales
- Brighton & Hove City Council (South Portslade ward member)
- Carats Café Bar
- CityCoast Community Development Group
- Environment Agency
- European Metal Recycling
- GVA (representing Shoreham Regeneration Ltd)
- Hargreaves
- Kingsway and West Hove Residents' Association
- McGough Planning Consultants Ltd (representing Hansteen Holdings)
- Prospective Planning (representing Maritime Atlantic)
- Shoreham Slipways Group
- Tongue Tied Ltd
- Western Esplanade Management Company
- West Sussex County Council

3.10 The main points raised during the consultation to were:

- Generally positive support for seeking to improve the A259 corridor, regenerate the harbour environment and activate the waterfront

- The need for a proactive employment strategy / delivery strategy to address the needs of existing businesses in the harbour
- The need to prevent future conflicts arising between port/industrial uses and new residential uses
- Consideration of appropriate development heights along the A259
- The need to mitigate the impacts of additional traffic
- The need to ensure new developments mitigate flood risk and address wider sustainability issues
- The need to ensure that capacity of minerals wharfage is protected at the port

3.11 The emerging proposals were also subject to Sustainability Appraisal by a panel of officers from the partner local authorities and the Environment Agency.

Draft Development Briefs

3.12 All responses to the consultation on the Emerging Proposals Report and the findings of the Sustainability Appraisal panel were taken into account in producing the Draft Development Briefs.

- 3.13 On 7 January 2013 a joint presentation was held for members of the Adur Planning Committee and Brighton & Hove Planning Committee. District and city councillors representing affected wards and county councillors representing affected divisions were also invited.
- 3.14 Members had the opportunity to ask questions of the consultant team and officers of Shoreham Harbour Regeneration.
- 3.15 Following the presentation, the Draft Development Brief and its accompanying Sustainability Appraisal were submitted to Brighton & Hove Economic Development and Culture Committee on 10 January 2013. The Draft Development Brief for the Western Harbour Arm was submitted to Adur Planning Committee on 7 January 2013 for comment and approval to formally consult. They were then submitted to the Cabinet Member for Regeneration.
- 3.16 Between January 28 and March 8 2013 the Draft Development Briefs and their accompanying Sustainability Appraisals were subject to a period of formal consultation.
- 3.17 All organisations and individuals on the Shoreham Harbour consultees databases, including statutory consultees, were contacted by email and/or letter to inform them of the consultation period. All were invited to submit representations on the draft briefs.
- 3.18 Additionally, letters were sent to all businesses and landowners in the development brief areas. Addresses and contact data were obtained from the councils' Local Land and Property Gazetteers and the Land Registry.
- 3.19 The consultation period was advertised in the Shoreham Herald and on the websites, Twitter and Facebook pages of the partner local authorities. A joint press release was also distributed to local, national and trade media organisations. During the consultation period the development briefs and SA reports were available in the following locations:
- Hove Town Hall
 - Portslade City Direct
 - Adur Civic Centre
 - Nautilus House (Shoreham Port Authority)
 - Hove Library
 - Portslade Library
 - Southwick Library
 - Shoreham Library
 - CityCoast Centre
 - South Portslade Community Centre
 - Southwick Community Centre
 - Shoreham Community Centre
- 3.20 All documents and the supporting evidence studies were also available from the Adur & Worthing Councils website.

3.21 Drop-in public exhibitions were held at Hove Town Hall, Adur Civic Centre, City Coast Centre and Shoreham Farmers' Market. Officers were available to answer questions and discuss the proposals in more detail. Approximately 300 visitors to the exhibitions were recorded.

3.22 A consultation workshop was held on 7 March 2013 at Adur Civic Centre. This was attended by 60 people including officers of the partner authorities, representatives of community and residents' groups, local businesses, landowners and developers. The following organisations were represented at the workshop:

- Adur District Council / Adur & Worthing Councils
- Adur Voluntary Action
- Allies and Morrison Urban Practitioners
- Boho Green
- Brighton & Hove City Council
- Carats Café Bar
- CityCoast Community Development Group
- City Gateway Developments
- Community Association of Portslade South
- Fishersgate Community Association
- Friends of Shoreham Beach
- Friends of Shoreham Fort
- Hansteen Holdings
- Hove Business Association
- Kingsway and West Hove Residents' Association
- Lidl UK
- McGough Planning Consultants Ltd

- Portslade Community Project
- Robinson & Co Chartered Town Planners
- Shoreham Beach Residents' Association
- Shoreham Harbour Regeneration
- Shoreham Port Authority
- Shoreham Society
- Shoreham Slipways Group
- Western Esplanade Management Company
- West Sussex County Council
- Worthing and Adur Chamber of Commerce
- Young Calibration Ltd

3.23 During the consultation period 51 formal written representations were received. Of these 20 related mostly to the Western Harbour Arm, 25 related to South Portslade Industrial estate and Aldrington Basin, and 6 related to both areas. This included representations from local residents and the following organisations:

- Adur District Council (Planning Policy)
- Barton Willmore (representing Co-operative Group)
- East Sussex County Council
- Environment Agency
- European Metal Recycling
- Federation of Small Businesses
- First Plan (representing Day Group Ltd)
- GVA (representing Shoreham Regeneration Ltd)
- Natural England
- Rapleys (representing Hargreaves Management Ltd)
- Say No To Supermarkets in Shoreham Campaign

- Southern Water
- Transition Town Shoreham
- Shoreham Slipways Group
- McGough Planning Consultants Ltd (representing Hansteen Holdings)
- West Sussex County Council

3.24 All representations relating to the Western Harbour Arm are included in Appendix 2.

3.25 Many representations were broadly supportive of the overall aim to regenerate parts of the Shoreham Harbour area. All representations were considered when redrafting the proposals and principles in the development briefs. Officers prepared a response to representations and proposed changes to the briefs.

3.26 Appendix 3 summarises the issues raised during the consultation period, officers' responses and the amendments to the development brief.

Appendix 1: SPD consultation checklist

SPD Stages	Comments
Pre-Submission Notification and Consultation - Evidence Gathering and Early Engagement	
Update the council's website regularly with regards to the type of SPDs the council is working on.	The Local Development Scheme (LDS) is available on the AWC website. This lists all planning policy documents which the council is working on. Development Brief.
Evidence gathering with the use of background studies – make viewable on the council's website with hard copies available on request.	The Development Brief has been informed by a number of background evidence studies. These are available from the Shoreham Harbour pages on the AWC website. Hard copies will be made available if requested.
Update consultation dates on council websites.	The Shoreham Harbour pages on the AWC, BHCC and WSCC websites, and the Shoreham Harbour Regeneration website have all been regularly updated with information regarding consultation dates.
Use of various consultation methods relevant to the nature of the SPD	Various consultation methods have been used during the early engagement stage These include workshops, exhibitions, meetings and informal consultation. These are detailed in Section 3 of this report.
Publish Draft Document	
Consultation period between 4 and 6 weeks where appropriate.	The Development Brief and its SA were subject to a six week period of formal public consultation.
Notify all those who made representations and make comments available to view.	This document fulfils these requirements.
Prepare a statement identifying those consulted, including a summary of the main issues, and how those issues have been addressed.	This document fulfils these requirements.
Make copies of the statement and the amended SPD available to view.	This document and the amended Development Brief are available on the AWC website.

Adoption	
Document amended as appropriate following representations.	The Development Brief has been amended, taking the representations into account
Adopt SPD as amended.	The amended Development Brief will be submitted to Adur Planning Committee for approval and the Cabinet Member for Regeneration for formal adoption
Notify all those who made representations or have requested to be notified that the SPD has been adopted.	All respondents will be notified following adoption of the Development Brief

Appendix 2: Representations received during the public consultation 28 January – 8 March 2013 (include dates ?)

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Individual

OTHER COMMENTS	
Reference	Comments
	<p>Further to the development briefs for the western harbour arm in Shoreham, the plans look very exciting and a huge improvement on what is there now.</p> <p>However there is very little planning for residents parking and maybe provision could be made on the north side of the road for a couple of largish multi storey car parks specifically for resident parking. Also provision for numerous car club spaces may alleviate the need for everyone to own cars. It is impractical and dictatorial to assume people who live on this site will not be car users. The site is quite a distance from a railway station and the bus service is inflexible and inappropriate for many working people.</p> <p>The non resident potential may be difficult to realise unless rents are very reasonable. Presumably a mix of retail and office type use would encourage these spaces actually being commercially viable.</p>

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Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?	
Reference	Comments
	I think the vision and objectives may be realistic in a stronger economy but the number of residential units seems to be a major over development of this area.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	
Reference	Comments
	I think the volume of housing will significantly affect the A259 traffic. There are no plans to widen this road and the idea of encouraging people to abandon their cars in unrealistic. The number of access points from the residential area onto the A259 will require either mini roundabouts or traffic lights which will further increase congestion.
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
	I think the illustration looks overcrowded and cluttered. The majority of the homes seem to be planned to be alongside the A259 which will mean considerable traffic noise for these homes – not an attractive riverside location – with the secondary road alongside the river making direct access to the river impossible without crossing a road.
Q4: What are your views on the Guiding Principles for the Development Brief Area?	

Reference	Comments
WH4	At the moment the town centre already is dying with the majority of shops being charity shops and food and drink outlets. I do not think there is demand for more food and drink outlets and if this area has the demand it will take business from the town centre which it cannot afford.
WH6	The A259 must be improved for drivers to allow for a massive increase in traffic, and the traffic increase will be compounded the extra crossing points proposed. Increased traffic jams will increase noise and air pollution. The waterfront route – proposed to increase a bus route will detract from the waterfront location as all food and drink outlets or home will have to cross this road to access the waterfront. This makes the whole development more unattractive.
WH17	No provision for public hard or slipways to utilise the river – there are only 3 current slipways east of the footbridge – not 6 as stated in the report (taken from the Adur council website). There are 6 east of the Norfolk road bridge.

1003

Individual

OTHER COMMENTS	
Reference	Comments
Housing	I would like to make a point re the plans for housing in the development plan. I understand that the plans include social housing as well as other housing. I would just like to say that I hope all the other housing will not be priced at the luxury 'top end' of the market and that it will provide property to buy at reasonable rates for local people who do not qualify for social housing but are not in a position to afford luxury developments.
Hotel	In addition I think the inclusion of a hotel would bring jobs and income to the area.

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Individual

OTHER COMMENTS	
Reference	Comments
	<p>This project is a complete waste of money for Adur tax payers the following reasons:</p> <ol style="list-style-type: none"> 1. It is obvious that the 'consultants' did as they were told. 2. The town is at breaking point with regard to car parking, any new development should therefore provide at least one car parking space per household. Space should also be provided for visitors. 3. If you build these houses and increase the local population where you build the schools, provide more leisure facilities? 4. The A259 cannot cope with more traffic. 5. Where do the organisations along the river transfer to? 6. Since it is currently an industrial area why not encourage more business. Why not transfer industrial

	<p>organisations in Dolphin Road to this site?</p> <p>7. The brief suggests adding office accommodation suggesting residents could work on site. This was an excuse for the housing across the river and office space was never taken up.</p> <p>8. Why not consider transferring the waste facility across the road to the river side and move waste by boat?</p> <p>9. The long term idea is to build houses on the current shops and industrial units north of the A259, where do these organisations move to?</p>
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European Metal Recycling

OTHER COMMENTS	
Reference	Comments
	<p>I refer to your letter dated 24 January 2013.</p> <p>As previously highlighted we are very concerned that it is assumed in this document that EMR and GB Oils will be vacating their sites at Shoreham. For clarification and having spoken to GB Fuels both of us have previously made it absolutely clear that we have no current plans to move from our sites.</p> <p>The council should not assume otherwise.</p> <p>We have both invested a substantial sums in our sites and we provide an essential service to local businesses and individuals.</p> <p>I would emphasise that whilst EMR and I am told GB Oils is prepared to consider alternative locations both of us have bitter experience of how difficult and costly such a move can be.</p> <p>We have agreed to look at an alternative sites but this has not yet happened and it should not be assumed that one is going to be suitable or available.</p> <p>We repeat our very strong concerns that the Development Briefs only makes passing reference to the possible effect arising from the ongoing operation of certain businesses but fails to take any account of these in the plans. Proposing the premature zoning of land for residential development without resolving the constraints.</p> <p>The very fact that the businesses will be continuing in occupation for the foreseeable future will lead to severe restrictions on any developments that are not reflected in the plans. Both due to the effect of HSE guidance on safety zones and to the existence of the Oil terminal or noise in relation to us.</p> <p>The allocation of 1050 houses in this area therefore seems to be based on an incorrect assumption and we would strongly question its deliverability.</p> <p>Indeed the plans claiming to illustrate a phased development show housing being built right up to the boundary of our scrap yard and the oil terminal. This is not a realistic option.</p> <p>It is essential that as part of the Development Plan the Council irecognise the effect that the ongoing business has on the potential developments and identify suitable sites for the relocation.</p> <p>We are concerned that policies are being proposed to allow premature zoning of land for residential development</p>

	<p>without resolving the constraints. Leading to similar issues that have arisen following the similar premature zoning of the Sussex Wharf site.</p> <p>Unlike elsewhere in the brief no potential solutions are identified for the "Technical Constraints" which include the Waste Management use and the Health and Safety Executive safety zone. We would urge the council to reconsider this?</p> <p>Indeed I am aware of a planning permission that was granted in 2006 for around 1000 houses and flats in the Midlands but which has now lapsed because no provision was made by the Council and the Developer to find an alternative site for a use such as ours. They had to rule out the compulsory purchase option given its expense.</p> <p>I therefore feel that it is crucial that the effect of both of these businesses continuing on their current sites be provided for in any plan. Please can you make sure that your draft development briefs are amended to reflect this probability.</p>
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Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? No	
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	
Reference	Comments
	Usual gobbledygook
Q4: What are your views on the Guiding Principles for the Development Brief Area?	
Reference	Comments
	More gobbledygook
Q5: Do you have any further comments on the Draft Development Brief?	
Reference	Comments
	Here we go again! Trying to cram in as many residential units as possible, without adequate parking. Or improvements to the already congested main road. Will the services be able to cope?
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments
	Your definition of sustainability differs from the dictionary.

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Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? YES	
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? YES	
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
	Very smart and agreeable to the area around it.

Q4: What are your views on the Guiding Principles for the Development Brief Area?	
Reference	Comments
	Good. Very updated and in common with 2013.
Q5: Do you have any further comments on the Draft Development Brief?	
Reference	Comments
	Go into in great detail
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments
	Make sure you have covered every detail.

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Firstplan (on behalf of Day Group Ltd)

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?	
Reference	Comments
	Objective 2 seeks to support and promote the important role of the Port within the local and wider economy. Objective 3 aims to improve the business environment to support the needs of existing businesses. These objectives are supported by the Day Group Ltd. It is important that the needs of existing businesses are recognised in order to ensure that the development brief is sustainable and is in accordance with National planning policy.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	
Reference	Comments
	Section 3 identifies that existing uses at the Western Harbour Arm make a significant contribution to the local economy and those needs should be taken into account in planning for the area. It also states that vacancy rates are low and that the principle of releasing land from industrial and port-related uses could be acceptable in the longer term of the Port's operation plans. These are all relevant constraints and opportunities for the area. However, it should be more explicitly stated that the redevelopment of the Western Harbour Arm is a long term proposal. In the meantime it is important to avoid planning blight, which is a potential constraint. Temporary uses should be granted to ensure productive use of land in the interim should redevelopment proposals not be forthcoming.
Q4: What are your views on the Guiding Principles for the Development Brief Area?	
Reference	Comments
	Day Group support point 2 of the land use guiding principles. In particular maintaining a sufficient flexible approach which enables certain sites to remain in their existing use in the medium term; requiring applications to provide clear evidence of a relocation strategy; and ensuring that redevelopment does not compromise the ongoing operation of

	<p>sites which are unlikely to come forward in the later stage of the process. However, in addition to this there should also be recognition of the potential for granting further temporary consents for existing businesses in the absence of redevelopment proposals coming forward.</p>
<p>Q5: Do you have any further comments on the Draft Development Brief?</p>	
Reference	Comments
	<p>The potential for temporary consents should be recognised as an opportunity in Section 3 of the draft Development Brief and as a guiding principle in Section 5. It is suggested that the following wording could be inserted: “Prior to sites coming forward for redevelopment, planning permission for employment uses may be granted for a temporary period in accordance with the Shoreham Harbour Interim Planning Guidance”</p>
	<p>Potential sites for relocation of existing businesses should be identified as part of the Development Brief process.</p>
	<p>Further comments are contained within the accompanying covering letter which should be read in conjunction with these representations</p>
<p>OTHER COMMENTS</p>	
Reference	Comments
	<p>We write on behalf of our client, Day Group Ltd who import materials by water and operate an aggregates bagging plant at Kingston Railway Wharf, Brighton Road, Shoreham by Sea. This site is located within the Western Harbour Arm Development Brief area. The Day Group gained planning permission in September 2010 for the temporary use of the site for an aggregates bagging plant. This permission will expire in September 2013 and the Day Group will be looking to renew the consent for a further temporary period. We have completed the consultation questionnaire and have set out our further comments on the draft Development Brief in this letter. The draft Development Brief identifies that the existing uses at the Western Harbour Arm make a significant contribution to the local economy and their needs should be taken into account when planning for the area. Day Group welcomes this approach, however the document does not explicitly set out how support for existing businesses will be delivered. It is therefore important that the Development Brief refers to the potential for continued temporary permissions in the short term and the need to provide suitable alternative sites for existing businesses looking to relocate. These issues are considered below:</p>
Temporary Planning Permission	<p>The need for regeneration at Shoreham Harbour was recognised in the 1990s and has been ongoing since then. However, securing the comprehensive redevelopment and redevelopment of the area has proved to be challenging. The Sustainability Appraisal document produced to support this consultation highlights the complexity of the situation and sets out the delays which have already occurred. The Port Masterplan (2010) recognises that this area will come forward in the long term, stating at paragraph 6.50:</p>

	<p>“The redevelopment of the Western Arm from the current uses is a relatively long term proposal that is likely to require significant public sector investment”</p> <p>On the basis of the above, the Western Harbour Arm Development Brief should make it explicit that the redevelopment of the Western Harbour Arm is a long term proposal and, therefore, that temporary uses can be granted in the meantime to avoid planning blight and ensure productive use of the land in the interim.</p> <p>The Day Group have made efficient and effective use of a previously vacant site. The aggregates bagging facility complements and supports Shoreham Port uses. The majority of aggregates bagged at the facility are marine dredged sands and gravels which are processed at existing wharves in Shoreham; although, some aggregate is also brought in directly to the site by boat.</p> <p>The location of the bagging facility close to the wharves minimises the length of vehicular trips involved in the transportation of the minerals, making it a highly sustainable form of development. The bagged goods are then delivered to local builder’s merchants in the area. The facility provides local employment and is well suited to the current character of the area.</p> <p>The principle of granting temporary planning consents is set out in the Shoreham Harbour Interim Planning Guidance (2011) which states that planning permissions may be granted for B2 (General Industrial) and B8 (Storage & Distribution) development for a temporary period so as not to conflict with future development plans. The Day Group entirely support this approach.</p> <p>The potential for temporary consents should therefore be recognised as an opportunity in Section 3 of the draft Development Brief and as a guiding principle in Section 5.</p>
Potential for Relocation	<p>Day Group has been exploring the possibility of locating closer to the functional port. However, there has been a lack of suitable sites available for some time. Given that economic activity at the Port continues to grow, this situation is unlikely to improve. The draft Development Brief sets out that:</p> <p>“Applications should provide clear evidence of a relocation strategy which enables business continuity”</p> <p>Day Group welcomes this approach. However in the absence of suitable sites there are concerns about the deliverability of this approach. It is therefore important that potential sites are identified as part of the Development Brief process. I trust this information is sufficient and will be taken into account when reviewing the Shoreham Harbour Western Arm. In the meantime, please do not hesitate to get in touch should you have any queries.</p>

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Rapleys (on behalf of Hargreaves Management Ltd)

OTHER COMMENTS	
Reference	Comments
	I write on behalf of my client, Hargreaves Management Ltd, following an instruction to review and submit

representations in respect of the current consultation for the Shoreham Harbour Western Harbour Arm Development Brief. My client holds an interest in the Halfords and B&Q retail premises located on the northern side of Brighton Road at numbers 43-61.

It is understood that the brief supports the implementation of the adopted Port Masterplan, which seeks to modernise and consolidate the port and capitalise on the benefits of the area's waterfront location. In these terms, the brief sets out a series of strategic objectives which seeks sustainable economic development and the provision of new homes at the Western Harbour Arm.

In these terms, the brief identifies the land to the north of Brighton Road (in which my client's site lies) as being a potential location for the delivery of a significant quantity of residential development. This proposal is supported in the context of the National Planning Policy Framework (NPPF) and the development objectives set out within local planning policy. Namely, the principle of residential development on previously developed land within sustainable locations.

My client supports this use for the site. However, the brief should, rightly and appropriately, further acknowledge the site's authorised and current use as retail and its suitability for such on going purpose.

That aside, Hargreaves also has concerns that the brief notes that development sites to the north of Brighton Road are unlikely to be brought forward during the plan period (although it is accepted that this is subject to review). Consequently, only sites to the south of Brighton Road have been subject to detailed design work. My client considers that it is incorrect to assume that its site cannot be brought forward for development during the plan period.

Thus, in summary, my client seeks the following commitments, in the brief, relative to its site.

1. That 43-61 Brighton Road is suitable for ongoing retail use (as demonstrated by the established planning history);
2. That, should the site become available, it is capable of being re-occupied/redeveloped within the timeframe of the brief, and
3. That, in becoming available, the site is appropriate for residential use (either in isolation or in association with retail development).

I trust these representations will be received as "duly made" and taken into account in the Council's preparation of the Shoreham Harbour Western Harbour Arm Development Brief. I reserve our right to make further comments at a later stage. Should you wish to discuss these representations further please do not hesitate to contact me.

1010

Barton Willmore (on behalf of the Co-operative Group)

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? **No**

Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? **No**

OTHER COMMENTS

Reference	Comments
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	<p>BACKGROUND</p> <ol style="list-style-type: none"> 1. We act on behalf of the Co-operative Group (“the Co-op”) and have been instructed to submit representations and objections to the current consultation on the Shoreham Harbour Western Harbour Arm – Development Brief (“the Brief”). 2. The Co-op is an important stakeholder in Shoreham, operating two Town Centre ‘Co-operative Food’ stores in Shoreham-by-Sea. The Co-op also operates stores in Southwick and Lancing. These stores all perform important anchor roles for their respective Town Centres, generating trade, footfall and associated spin-off benefits for other retailers. They provide a valuable contribution to Town Centre vitality and viability. 3. The Co-op therefore has a keen interest in the appropriate formulation of the Brief. Against this background, we set out our comments and in particular our objection to the emerging Brief.
	<ol style="list-style-type: none"> 4. The Town and Country Planning (Local Planning) (England) Regulations 2012 came into force on 6th April 2012. Regulation 2(1) defines the following: <ul style="list-style-type: none"> • “Local Plan” means any document of the description referred to in regulation 5(1)(a)(i), (ii), or (iv) or 5(2)(a) or (b), and for the purposes of Section 17(7)(a) of the Act these documents are prescribed as development plan documents; • “Site Allocation Policy” means any policy which allocates a site for a particular use or development; • “Supplementary Planning Document” means any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan; 5. Regulation 5(1)a states that any document prepared by a local planning authority which contains statements regarding one or more of the following is a local development document: <ol style="list-style-type: none"> i. the development and use of land which the local planning authority wish to encourage during any specified period; ii. the allocation of sites for a particular type of development or use; iii. any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of the land mentioned in paragraph (i); and iv. development management and site allocation policies, which are intended to guide the determination of applications for planning permission. 6. Regulation 5(2)(a) provides that documents which, if prepared, are to be prepared as local development documents are any document which: <ol style="list-style-type: none"> a. <ol style="list-style-type: none"> i. relates only to part of the area of the local planning authority; ii. identifies that area as an area of significant change or special conservation; and iii. contains the local planning authority's policies in relation to the area; and b. any other document which includes a site allocation policy.

	<p>7. Regulation 6 states that any document of the description referred to in Regulation 5(1)(a)(i),(ii) or (iv) or 5(2)(a) or (b) is a local plan. For the purposes of Section 17(7)(a) of the Planning and Compulsory Purchase Act 2004 these documents are prescribed as development plan documents under Regulation 2(1).</p> <p>8. The Development Brief has been prepared to guide future development at the Harbour and therefore constitutes a 'Local Plan' for the purpose of the Regulations. It is therefore subject to the procedures set out in the Planning and Compulsory Purchase Act 2004, including independent examination and cannot be adopted until the proper procedures are followed. Should the Council adopt the Development Brief without following the proper procedures, the Brief cannot be considered as a material consideration and is liable to challenge.</p>
Principle of Retail Development	<p>9. The Co-op generally supports the proposed development of the Harbour for residential and B Class employment uses. However, the Co-op objects to the potential retail development which the Brief appears to support.</p> <p>10. The Brief (in particular paragraphs 4.1.2, 5.1.14 and 5.2.3) promotes the Harbour for new retail development, including a 'larger retail outlet'. Figure 5.2 identifies a large unit for 'Employment / Mixed Employment' on the Frosts Site, south of Brighton Road. There are no other large units identified in the Brief. The Site is being publically promoted for a foodstore and it is understood a planning application is expected in the near future.</p> <p>11. The Co-op is extremely concerned that retail development on this site, or potentially elsewhere in the Harbour, is supported in the Brief, without any evidence base justification.</p> <p>12. The Council's retail evidence base comprises the Retail Study Update (DTZ, July 2009). Whilst this is now considered to be out-of-date, being based on a household survey undertaken in March 2009, it represents the most up-to-date assessment of capacity, or need, for new retail development in Shoreham.</p> <p>13. The Retail Study only identifies capacity for an additional 250 sq m net convenience goods floorspace in Shoreham up to 2026. The NPPF (paragraph 23, sixth bullet) is clear that sites should be allocated to meet the scale and type of development needed in Town Centres. Given there is only very limited capacity identified in the Council's current Retail Study, there is no justification for a large format foodstore in Shoreham.</p> <p>14. No consideration has been given to the sequential approach set out in the NPPF (paragraph 23) or the potential impact that a foodstore could have on the Town Centre, including the anchor Co-op stores. A new foodstore on the Frosts site or elsewhere in the Harbour area could significantly adversely impact on the vitality and viability of Shoreham Town Centre. In the absence of an identified need and the lack of a sequential and impact assessment, there is no justification for a foodstore in the Harbour area.</p>
Conflict with Emerging Adur	<p>15. The Co-op considers that the Brief conflicts with the emerging Local Plan which allocates the Civic Centre site for development to include a foodstore (emerging Local Plan - Policy 11). The Co-op has submitted</p>

Local Plan	<p>representations to the emerging Local Plan in respect of that site which demonstrate that there is no justification for the allocation of an additional foodstore site in Shoreham</p> <p>16. Notwithstanding the content of these representations, the promotion of a store on the Frosts site or elsewhere in the Harbour area would directly conflict with the emerging allocation, the delivery of the Civic Centre site and in turn the delivery of the emerging Local Plan.</p> <p>17. It should also be noted that the Draft Local Plan Sustainability Appraisal (Objective 18, page 73) specifically excludes retail development at the Harbour.</p> <p>18. The Brief should exclude any reference to retail development at the Harbour. Any reference to retail is contrary to the emerging Local Plan.</p>
Sustainability Appraisal Objective 19	<p>19. The Co-op objects to the adequacy and robustness of the Sustainability Appraisal (SA) in respect of Objective 19. The commentary to this Objective suggests that the Harbour is a suitable location for new development, including additional services and facilities.</p> <p>20. It should be noted that the Harbour lies outside of the defined Town Centre in retail policy terms. Any retail development will be subject to a sequential assessment of alternative sites and an impact assessment in order to understand the likely effects of any scheme on the Town Centre.</p> <p>21. Without such assessments, it is not considered that the Sustainability Appraisal can conclude that the Harbour is a suitable location for such development.</p>
Recommendations	<p>22. Notwithstanding our comments in respect of the status of the Brief, for the reasons set out above, any references to retail development at the Harbour should either be deleted or explicitly exclude a foodstore / convenience goods floorspace.</p> <p>23. Without this change, the Brief would not be considered sound against NPPF paragraph 182 as it would:</p> <ul style="list-style-type: none"> • not be justified against the evidence base; • not be effective, as it would result in the Local Plan being undeliverable; and • not be consistent with national policy in the form of the NPPF. <p>24. The Brief will also inform the preparation of the future Joint Area Action Plan (JAAP) for the Harbour. For the reasons set out above, the JAAP would not be considered sound unless it follows the above recommendations.</p>

1012

Transition Town Shoreham by Sea

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? No	
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? No	
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments
	Transition Towns (also known as transition network or transition movement) is a global grassroots network of

communities working to build local resilience in response to peak oil, climate change, and economic instability. As a group concerned with sustainability, we welcome the opportunity to take part in this consultation. Of particular interest to us are the sustainability objectives contained in the development briefs, the Sustainability Appraisal(SA) and the Strategic Environmental Assessment (SAE).

In compliance with the new NPPF, we see that areas of common concern are being addressed in the briefs, particularly in respect to residential developments, and (on the face of it) proposals for reducing car use. However we would identify clear incompatibilities between the sustainability objectives set for the Regeneration Project and types of development that may be permitted by Adur Council. Specifically we are concerned about proposals for supermarket developments at the Frosts and Parcel Force sites.

Supermarket developments.

Local people are well aware of the corrosive effect that supermarkets have had on our town centre. Their fears mirror those of many other communities in the UK. The growing culture of convenience shopping pushes us ever forwards towards an economic system that relies heavily on oil in methods of food production; a long chain of delivery, and, increased local car use.

Given that the area was originally designated as a second wave 'eco-town', it is regrettable that from early stage, planners were resigned to accommodating a supermarket development in order to secure significant spin off benefits from 106/ CIL contributions. Whilst we fully recognise the need for local infrastructures (notably housing and sea defences) it appears that little time was spent exploring alternative developments and/or sources of funding. The emphasis on 'mitigation measures' now underlines the 'challenges' planners face delivering sustainable objectives. Ironically, there is little motivation for Councils to minimise environmental impacts when they are able to negotiate more CIL and 106 monies from high impact developments.

The briefs lack clarity in respect to proposals for large food retail developments that have been in the public domain for some time. As a result, incompatibilities between sustainability objectives and the scale and potential impact of this type of development are understated. We concur with the say no to new supermarket campaign in identifying areas in which supermarket developments fall short of sustainability objectives. Full consideration of these areas would in our view be necessary to ensure that the final development brief is sound.

We are also very concerned that the Western Harbour Arm plans do not comment on the cumulative impact of plans for adjacent developments. Of particular concern is the proposed development by Edgely Green Power (EGP) of a Biofuel power station at the harbour. The impact on air quality of this development is equivalent to putting 50,000 cars on the roads of Shoreham all doing 10,000 miles a year. This pollution causes respiratory and heart diseases and the small particulates can penetrate the lung walls into the blood and the nanoparticles can penetrate the cell membranes causing cancers, strokes and multiple other health problems. That such a development in close proximity to the Western Harbour Arm is not included as part of the consultation is wholly unacceptable and points to the importance of a holistic planning approach to developments along Southwick/Shoreham coast to ensure the cumulative effects of

	new developments are properly considered.
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1013

Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?

Reference	Comments
	I endorse the comment in 2.1.6. that the development is “highly constrained by Brighton Road (A259)” and would add that the choice of developments should be governed by the need to minimise the impact on traffic flows. It would appear to me that any development will have an impact, but that perhaps residential and mixed use would be preferable to extra retail use, especially something generating significant traffic flows, such as a large food supermarket.

Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?

Reference	Comments
	With regard to my comment in 1 above, I note that in paragraph 3.3.1. it is recognised that the Brighton Road already suffers a “high degree of congestion”. It must be a major concern that development will only make this worse.

Q3: What are your views on the Illustrative Framework for the Development Brief Area?

Reference	Comments
	Given the comments referred in 1 and 2, I am concerned about proposal 4 (para 4.1.2.) for the creation of a new retail space. It seems to me that the last thing needed is a large food supermarket drawing in extra traffic over and above that generated by the residential development.

Q4: What are your views on the Guiding Principles for the Development Brief Area?

Reference	Comments
WH3 5.1.11	I would think that small shops, food and drink, leisure and office space would be welcome in as much as it caters to new residents and minimises extra traffic flows. Also, perhaps community space for the area, including provision for a pre-school group?
WH4 5.1.14	I feel strongly that a new retail outlet, especially a food supermarket, would generate excessive traffic and would be unnecessary given the Holmbush retail area and the Ham Road Co-op Store.

1014

Say no to supermarkets in Shoreham campaign

Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?

Reference	Comments
	Say No to New Supermarkets in Shoreham Although we recognise the briefs are presented as conceptual/spatial strategies for the area, we suggest greater clarity is needed to describe the type of retail being proposed in order for the public consultation to be meaningful. Adur planning department have publically stated that they would favour an application by Morrisons for a large food

store 'to kick-start the regeneration scheme' and we understand that the mixed development at the Parcel Force site includes a significant food retail element. As far as we are aware, proposals for these sites are at a relatively advanced stage, yet there is only oblique reference to large food retail schemes in our reading of the Western Harbour Arm Brief .

Many local residents and small retailers are concerned about the negative impact of supermarket developments on the vitality and viability of the town centre and local shopping parades. In addition to the threat they pose to our local economy and existing jobs, there are further incompatibilities between the sustainability objectives set for the Regeneration Project and developments of this type.

Our petition, signed by hundreds of local people briefly outlines the reasons we consider supermarkets to be unsustainable.

Supermarkets are 'unsustainable' because they:

- endanger our local economy
- increase car use and traffic congestion
- rely on expensive, CO2 producing fossil fuels 'from field to fork'
- risk breaching local and European Air Quality Management targets
- threaten food security, locally and globally

The Western harbour Arm development brief, the SA and the SAE apply sustainability criteria in some detail to residential uses. However, the reports are left rather vague regarding criteria applied to retail. The document therefore understates incompatibilities between sustainability objectives and the potential impact of these types of development. The SA's matrixes (8.1 and 8.2) do not appear to represent this impact, nor do conclusions reached in 8.1.02. *"From examination of the matrix it can be seen that many of the objectives are compatible which means that they strengthen and support each other."*

Greater transparency about the impact of large food retail is required at this early stage to ensure that the development brief is sound. In particular, its impact on local traffic congestion and air quality. (We would identify the need for monitoring base line air quality beyond existing AQM areas, to include the stretch of the A259 where development is to take place.) During later stages of consultation we would expect more detailed assessment and rigorous methods employed for quantifying the social, economic and environmental impact of supermarket developments.

1015

Southern Water

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?	
Reference	Comments
	In our view a new objective is required which seeks to ensure that development is co-ordinated with the provision of infrastructure required to serve it, including water supply and sewerage infrastructure.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	

Reference	Comments
	<p>The area is crossed by several underground water mains and sewers. (The latter convey wastewater to the wastewater treatment works for treatment.) This infrastructure will need to be protected, so that it can continue to fulfil its function. This may constrain the layout of the development. This potential constraint needs to be recognised in section 3 of the development brief.</p> <p>There is insufficient capacity in the existing local sewerage system to serve the development proposed. Additional capacity will therefore be required to serve the development proposed. This will need to be planned and delivered in phase with the development. This issue should be recognised in the Development Brief.</p>

Q4: What are your views on the Guiding Principles for the Development Brief Area?

Reference	Comments
	A new guiding principle is required to ensure that development is co-ordinated with provision of necessary utility infrastructure, including local water distribution and sewerage infrastructure.
	A new guiding principle is required to ensure that the existing water distribution and wastewater infrastructure within the area is protected so that it can continue to fulfil its function and thereby serve existing and new development.

Q5: Do you have any further comments on the Draft Development Brief?

Reference	Comments
Appendix A Sustainability checklist	Under Flood risk on page 70, include “Sealed sewerage system and other flood mitigation measures to protect properties from surcharging during surface water flood events”. A sealed sewerage system and other measures (e.g. non-return valves) should be provided in new developments if they are located in areas designated as at risk from flooding.

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Federation of Small Businesses

OTHER COMMENTS

Reference	Comments
	<p>Much of SE England is already crowded, or else forms part of a Country Park etc, and particularly in Sussex the problems regarding the upgrading of the A27 hinder any further useful improvement to the road network to cope with increased commercial use and growing population.</p> <p>The West Sussex Policy Team of the Federation of Small Businesses feels that we should be looking at alternative forms of transport which have the added benefit of being more environmentally friendly and will bring economic benefits to the area.</p> <p>We believe that more and more we will have to revert to using the sea as the highway for as much cargo as possible. As a result there are strategic reasons why we cannot afford to lose the quays of the west arm of Shoreham Harbour. Once the wharfs have been converted to other non-port related use there will be no going back.</p>

	<p>At present the maximum sized ships accommodated in the western arm are 85 metres and have a capacity of less than 2000 tonnes. However modern ships with fore and aft transverse props could be longer as they would not have to turn round.</p> <p>Over the last 30/40 years fishing boats have got wider and wider as beams increase, and cargo ships are now following suit. The Panama Canal is now being modified to take much larger ships, not longer or deeper but much wider, and this increase in beam will also happen with coasters.</p> <p>In Europe the French are investing in a Canal project to link Dunkirk with Paris, and hence with the canal network in Germany and the Netherlands, including Rotterdam, so that sea-going vessels will have access to the whole network. It is estimated that it will take 500,000 lorries off the roads.</p> <p>In the not too distant future we could well be seeing 85 metre X 25 metre ships in the western arm of Shoreham Harbour (at present 85 X 12/14) with a carrying capacity of 5,000 tonnes. The increase of 10 metres in beam width makes a more efficient ship in terms of cargo capacity than a 10 metre increase in length.</p> <p>5,000 tonnes = 200 X 15 metre lorries + 3 kilometres of road with vehicles touching. There are many small ports round the UK where the length of ship is the controlling factor. We could even see mini container ships offloading from large container vessels at Felixstowe, and other similar ports, and conveying the containers by sea to the South Coast instead of via road.</p> <p>At present the Prince Phillip Lock is Shoreham port's greatest asset. This lock has a capacity of approximately 106.5 X 16.5 metres. With modern shipping trends as outlined above it is probable that it will become a liability without the capacity to hold a new breed of ships. Therefore it is now of utmost urgency to investigate the construction of a new lock to suit the future demands of sea trade.</p> <p>The land is available for this and it would ensure the future of Shoreham harbour as a modern and vibrant port with consequent benefits for the local economy.</p>
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1017

Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? Yes	
Reference	Comments
	Yes in the reasonable and assured assumption that the computer generated blue print that I examined in the library is correctly "bit mapped" into the "real world" with the precise rendering procedure followed – calling Bob the Builder 😊
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? Yes	
Reference	Comments
	Yes but needs tracing out on pictograph star-map 012
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
	Yes well, just checked it again. Looks beautiful!

Q4: What are your views on the Guiding Principles for the Development Brief Area?

Reference	Comments
Affordable	There should be a nice spread of affordable housing for all the spectrum of social strata.
Eco Friendly Environment	All the materials should be ethically sourced and designers must encourage the latest developments of renewable technology.
Energy Loop	All structures must adhere to a vigorous policy of energy recycling.
Plant and tree regeneration	There should be a healthy policy of plant, flower and keep growth as natural decoration.
Designs tasteful and colourful	There should be a comprehensive application of natural colour and design throughout.

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GVA (on behalf of Shoreham Regeneration Limited)

OTHER COMMENTS	
Reference	Comments
	<p>On behalf of Shoreham Regeneration Limited, we are instructed to make the following representations to the Western Harbour Arm Development Brief Consultation Draft.</p> <p>Our clients are continuing progress with preparing a planning application for the comprehensive mixed-use redevelopment of a key site within the Western Arm area, principally comprising the Frosts Car Showroom site and the Minelco Wharf site. It is expected that an application will be submitted later in Spring and it will comprise a food superstore and a mix of residential and employment uses, including new and improved pedestrian and vehicular linkages.</p> <p>We welcome the focus on the regeneration of the Western Harbour Arm area and the vision for the Harbour to be 'transformed into a vibrant, thriving, waterfront destination comprising a series of sustainable, mixed-use developments'. Indeed, it is our client's intention that the mixed-use redevelopment of its site will provide a first phase in the overall regeneration of the Western Harbour Area, and provide a unique opportunity to act as a catalyst for the regeneration of the rest of the Harbour area. It is within this context of our client's emerging proposals that we make the following representations to the various policies within the Development Brief. For ease of reference we have structured our comments to respond directly to the relevant chapters and paragraphs in the Consultation Draft.</p>
1.3 Objectives	<p>Whilst we agree with the broad thrust of the objectives for the Western Harbour Arm, we request that the objectives recognise the opportunities and need for new retail space within the mixed use redevelopment of the Harbour area. Retail floorspace, of a complementary type and scale to that offered in Shoreham-by-Sea town centre, will be required to sustainably support the new residential communities proposed along the Western</p>

	Harbour Arm, as promoted through the NPPF. The provision of retail is also consistent with draft policy elsewhere in the Development Brief including the Illustrative Framework at paragraph 4.1.2 and policy WH4: Retail, food and drink at paragraphs 5.1.13- 5.1.14.
1.4 Status of the Guidance	It is important to note that in accordance with the Planning and Compulsory Purchase Act 2004, only Development Plan Documents can lawfully allocate land. At paragraph 1.4.3 it recognises that the Development Brief will not be a Development Plan Document yet bullet 2 of the same paragraph states that one of the purposes of the Development Brief will be to 'define land use'.
3.3 Access, Transport and Highways	Although the area does appear to suffer from congestion at present the existing trip purposes should be investigated. The mixed use development proposed by the development brief offers a wide range of uses, ultimately providing an opportunity to stay within the development and the town centre. The correct mix of attractive uses on the site would reduce the need to travel and having a minimal impact on the local network. Many of the trips on the network at present will be travelling further to obtain the services, employment or retail demands which could be delivered by this development. Whilst this section of the brief sets the scene, a focus on delivering a sustainable development may resolve existing issues and the close proximity to the town centre will aid this significantly. A car free riverside route would help to combat some of the issues raised an example being an improved link for the existing cycle route which deviates to the north of the railway line at present to avoid Brighton Road. The riverside provides the optimum solution. by reducing the distance and removing some potential concerns.
5.1 Policy WH2 Provision of a new residential community	Bullet 7 of paragraph 5.18 seeks to avoid the provision of single aspect north facing flats. The Development Brief needs to be flexible and recognise that there are occasions when north facing single aspect flats will be acceptable to improve the viability of residential schemes and maximise the development potential of sites.
5.1 Policy WH3: Employment & Commercial Floorspace	We welcome the recognition of the role small shops can play in providing employment and generating footfall. The Brief should however recognise the benefit that retail along the Brighton Road frontage will provide a key route to the Western Harbour Arm and improve linkage to the town centre.
5.1 Policy WH4: Retail, food and drink and leisure	We fully support the recognition of an opportunity to accommodate a larger scale retail outlet in the area of the Harbour closest to Shoreham-by-Sea town centre. This policy is consistent with our client's aspirations for the site and the forthcoming application for the mixed use development including a foodstore will ensure that the food retail needs of the local area can be met in a sustainable manner. We also welcome recognition at paragraph 5.1.13 that ancillary retail has an important role to play in the regeneration

<p>5.1 Policy WH5: Public Open Space and Social Infrastructure</p>	<p>of the area.</p> <p>Whilst we recognise the need to provide open space to serve the new residential communities within the Western Harbour Arm, the Development Brief needs to ensure that the requirement for new open space is proportionate to the demand generated by any particular development; is appropriate to the uses proposed; and is viable.</p> <p>We question the deliverability or necessity of a single large open space within the 'Western Area', as highlighted in Figure 5.3. Much of the Western Area falls within land controlled by our client. The emerging proposals for the site include a large foodstore, residential and employment uses. The level of residential proposed as part of the mixed-use development would not generate demand for the scale of open space as envisaged in Figure 5.3, albeit we accept that this plan is purely illustrative.</p> <p>It is important that any requirement for development to provide open space infrastructure, as required through policy WH5, complies with CIL regulation 122, in that the provision is:</p> <ul style="list-style-type: none"> necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. <p>Policy WH5 needs to provide sufficient flexibility to allow development schemes to provide the scale and type of open space to meet the demand generated by the development itself.</p>
<p>5.1 Policy WH6: Connections</p>	<p>Our client's site is located between Brighton Road and The River Adur, and the provision of additional safe crossing points over Brighton Road is imperative to the redevelopment of the site.</p> <p>The key benefit of the site is the river frontage and we question the merits of including a vehicular route along this sensitive frontage. Whilst inter development vehicular trips may be necessary; this should not be encouraged and the route along the river should be restricted to non motorised travel where possible. A route through the development needs careful consideration as it is likely to act as a relief road should there be an accident or works on Brighton Road. If this route appears too attractive or offers a more reliable/scenic journey then it may become popular resulting in unnecessary car trips within the development.</p> <p>It is recommended that traffic be kept to Brighton Road where possible and the framework plan be designed to limit the need for inter development vehicle trips. A route through the area is also likely to result in two key junctions which will effectively have to accommodate the bulk of the traffic. By creating multiple junctions demand can be spread across the Brighton Road frontage reducing the loading on the network at each point resulting in a more fluid network. If all of the development traffic is directed to one or two points there is likely to be congestion. A multiple access strategy will also encourage inter development trips to be carried out by non vehicular modes. Therefore the propensity for linked trips may be higher as it will be easier to carry out a multiple destination trip by foot than travelling by car between each element.</p>

	This suggestion would achieve the objectives set out in the introduction of this development brief; "Sustainable Transport: To promote sustainable transport choices through ensuring that new developments are well served by high quality, integrated transport systems including improved pedestrian, cycling and public transport routes and seeking to reduce demand for travel by private car in innovative ways."
5.1 Policy WHB: Development Form	We support the design principles that seek to secure frontages along the riverfront and Brighton Road, and allow for car parking at ground floor level to counter flood issues. However, it is our view that the design principles set out in Policy WH8 and illustratively shown in Figure 5.6 are overly prescriptive. Whilst the 'framework' plan in Figure 5.6 is described as illustrative, the subsequent bullet points to paragraph 5.2.7 set out detailed guidance that provides only very limited flexibility for proposals to be brought forward in a way which does not reflect the illustrative plan. The illustrative framework plan provides only one solution that can meet the overarching design principles, and the policy guidance as drafted is too focussed on this one solution. It is our view that it would be more appropriate for the policy to establish a series of overarching design principles, rather than detailed design principles that focus on a single, illustrative framework plan. The guidance needs to provide sufficient flexibility that enables the design of each scheme to respond to its own unique circumstances and address issues such as site constraints, market demand and commercial viability.
Conclusion	We support much of what the Development Brief is seeking to achieve in promoting the comprehensive regeneration of the Western Harbour Arm. We are also encouraged that our previous representations have been taken on board and the opportunity for new large scale retail development within the western part of the harbour has been recognised. We would request, however, that the policy within the final Development Brief provides more flexibility to enable development to be brought forward of a type and form that has not yet been considered, but which would assist with achieving the vision for the Western Harbour Arm. We trust that these representations will be taken into account and confirm that we would be pleased to discuss our representations in more detail. We would be grateful if you would continue to notify us of further changes to the Brief.

1019

Shoreham Slipways Group

OTHER COMMENTS	
Reference	Comments
	The plans are starting to take shape and if implemented will make a great improvement to what is currently a rather depressing and under utilised area. A key factor is making good use of the riverside location. The proposed walkway, shared with bicycles and the odd car will enhance the feeling of openness and provide accessibility. One or more river inlets would help break the straight edge and provide areas of general interest – boats and water always attract people. Half-tide barriers could be used to prevent the inlets drying out and creating a more pleasing effect. Examples of this approach are the inner harbour in Dartmouth which is always a popular. Also, the regenerated area in Littlehampton

	<p>has a slipway and pontoons which provide an interest that supports a visitor centre and cafe plus encouraging people to visit the area. Mooring places along the quay will attract boating people, who will spend money, and hence help improve the economics of the area. Further, visitors will be drawn to the area and spend money which will benefit the local community. A slipway would be of huge benefit to both local people and those from further afield. Adequate parking will be essential for the area to be economically viable.</p> <p>It is vital that the guidelines for the developers are drafted to ensure that the costs of the public and non-profitable features are covered by S106 donations.</p> <p>I look forward to working with the regeneration team as the plans progress.</p>
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1020

McGough Planning Consultants (on behalf of Hansteen)

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?	
Reference	Comments
	Hansteen broadly welcomes the Vision and Objectives set out in the draft Brief, but has a some concerns about how they impact on land to the north of Brighton Road (in particular the Malthouse Estate) and therefore wish to register a number of objections (see attached letter for details).
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	
Reference	Comments
	Hansteen has concerns regarding the status and limits of the draft Brief; particularly the potentially negative impact it will have on the development potential of land to the north of Brighton Road and the Malthouse Estate (see attached letter for details)
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
	As at section 2 above.
Q4: What are your views on the Guiding Principles for the Development Brief Area?	
Reference	Comments
	<p>Hansteen supports many of the Guiding Principles in terms of what they are trying to achieve within the whole of the Western Harbour area. Unfortunately, the draft Brief appears to exclude land to the north of Brighton Road from further consideration until the next plan period (post 2028).</p> <p>Hansteen is concerned how the Guiding Principles would apply to the land to the north of Brighton Road and the Malthouse Estate</p>
	Hantseen also has significant concerns/objections about specific Guiding Principles which are set out in the attached letter.

Q5: Do you have any further comments on the Draft Development Brief?

Reference	Comments
	<p>Hansteen is concerned Officers are seeking to use the draft Brief to postpone any consideration of the development potential of land to the north of Brighton Road (and the Malthouse Estate) until the next plan period (post2028). Given the constraints to development on the land to the south of Brighton Road (eg flood issues, potential contamination and the need to relocate businesses etc), this approach fails to recognise the realistic contribution site's north of Brighton Road could make to the development of the Western Harbour area.</p> <p>In particular, the draft Brief undermines the future development potential of the Malthouse Estate, which is the subject on on-going discussion with Officers about it future development right now.</p> <p>See attached letter for further details.</p>

OTHER COMMENTS

Reference	Comments
	<p>Shoreham Harbour, Western Harbour Development Brief Consultation.</p> <p>Thank you for inviting me and representatives of Hansteen to the consultation workshop event at the Civic Centre on 7th March. We found it to be a good way of getting a better understanding of what Council Officers/ consultants are proposing in the draft Development Brief. It was also useful to hear the comments of some of our neighbours and other participants in the workshop.</p> <p>As you may recall from our earlier discussions, Hansteen Holdings plc owns Malthouse Estate, on the north side of Brighton Road (A259), which is in the Western Harbour area. I have attached a further copy of an estate brochure to show you precisely where the estate is.</p> <p>The Malthouse Estate comprises four portal-framed, part brick, part profiled-metal clad industrial units with shared yards and parking, with a total area of just under 61,000 sqft (just over 5000 sqm). The units are situated on the north side of Brighton Road (which provides access) and abuts the Shoreham/Brighton railway line.</p> <p>It is in a sustainable location close to the town centre within the Western Arm of the Shoreham Harbour Regeneration area. There are a variety of uses along the north side of the A259 as it goes through the Western Arm, including the existing employment, sui generis and non-food retail uses.</p> <p>For ease of reference comments have been arranged to follow the format set out in the draft Brief.</p>
Vision	<p>Hansteen supports the Vision set out in section 1.2 of the draft Development Brief. We agree that the Western harbour area will play a key role in the delivery of the Vision and support the range of identified uses; ie residential-led mixed use development, which includes a range of retail and commercial opportunities.</p>
Objectives	<p>Hansteen wishes to voice its support for the nine listed objectives set out at section 1.3 of the draft Brief. However, we are concerned that whilst the range of acceptable uses is referred to within the objectives (and referred to in the Vision), none of them refer specifically to retail use, despite this also being specifically identified in the Vision. Hansteen considers this to be an important omission, which only serves to confuse what the draft Brief is seeking to</p>

	<p>achieve. A reference to retail could be achieved by a further objective (objective 10) or by amending one of the listed objectives, for example objective 3. Accordingly, Hansteen objects to the nine listed objectives because of the omission of any reference to retail use, either within any of the listed objectives, or within a new objective 10.</p>
Status of the Guidance	<p>Hansteen is concerned about the status of the Guidance once it is adopted. Particularly given that the stated purposes of the Brief include facilitating change, defining land use and identifying parameters to ensure development of the highest quality (para1.4.3).</p> <p>The Council does not intend to adopt the Brief as a Development Plan Document, even though it appears that it will be a material consideration in determining planning applications. Whilst it may be advantageous to adopt a Development Brief in this way in terms of timescales, it is potentially prejudicial to the interests of anyone with concerns about the better planning of the area (eg landowners, residents, employers). If the Brief were more recognisably part of the Local Plan/ LDF, then there would be opportunities to make formal representations and have any objections heard and properly tested at an Examination.</p>
Illustrative Framework	<p>Officers will be aware through meetings, correspondence and previous representations that Hansteen is looking at the redevelopment of some or all of the Malthouse Estate. The estate is a substantial land holding within the Western Harbour area and, as you know, its future redevelopment is being considered right now. In contrast to many sites south of Brighton Road, the Malthouse Estate is not constrained by flood risk – which will have a significant impact on the deliverability of much of the land within the Western Harbour area.</p> <p>Given this context, Hansteen is very concerned that there appears to be no mention of the future of the Malthouse Estate specifically, or the rest of the land/ sites north of Brighton Road (A259) within the identified Local Plan period (up to 2028).</p>
Guiding Principles	<p>Generally, Hansteen supports much of what the Guiding Principles set out to achieve. However, we are concerned that the Guiding Principles only relate to the development of land south of Brighton Road. The draft Brief does not consider the development of land to the north of Brighton Road (including the Malthouse Estate), and even suggests that this should be a matter for the new plan period (post 2028).</p> <p>P a g e 3</p> <p>Hansteen has specific concerns about a number of the Guiding Principles, which are set out below.</p>
WH1	<p>WH1 of the draft Brief states that sites to the north of Brighton Road (including Malthouse Estate) are “unlikely to come forward during the plan period (and that)... the status of these sites should be kept under review, as circumstances may arise in which it would be appropriate to redevelop these sites either at the end , or beyond the current plan period” (Para 3 p.41). The draft Brief is straight forwardly suggesting any discussion about the future of that land to the north of Brighton Road (including the Malthouse Estate) should be left until the end of the emerging JAAP plan period or post 2028.</p> <p>Given the context set out above (and the discussions with Council Officers about the future of the Malthouse Estate that have been taking place over the last year), we consider this approach to be highly prejudicial to the consideration</p>

	<p>of any development proposal affecting the land to the north of Brighton Road. Hansteen would ask that the purpose of WH1 is clarified as a matter of priority and if (as it seems) the intention is to inhibit redevelopment potential of the Malthouse Estate until the next plan period (after 2028), we object in the strongest possible terms.</p> <p>In addition, clarification is sought regarding para 4 of WH1 to ensure that the requirement to compensate for the net loss of employment floor space will apply across the Western Harbour area and not just the site north of Brighton Road. At this stage, Hansteen objects to any provision that seeks to limit such a requirement to employment floor space north of Brighton Road.</p>
WH2	<p>WH2 refers to development of sites north of Brighton Road for further residential development beyond the plan period. It goes on to suggest that more detailed assessment could take place as part of a review of the JAAP. Hansteen is concerned that this further demonstrates that the draft Brief intends any development of land to the north of Brighton Road to be as part of the next plan period. For the reasons given above, Hansteen objects to WH2.</p> <p>Hansteen is also concerned that WH2 suggests that between 150 to 550 dwellings could be built on the land to the north of Brighton Road. No other use is mentioned, nor is there any acknowledgement of the potential for other uses or mixed use. Here the draft Brief not only tries to kick in to the long grass the consideration of the development of the land to the north of Brighton Road, but it goes further and suggests in future it will be residential use only. Hansteen objects to this approach and any such</p>
WH4	<p>WH4 refers to a requirement for shops, cafes and restaurants that are ancillary to new mixed use development in the Western Harbour area. Hansteen supports this aim, but would ask that it is made clear that the requirements extend to land north of Brighton Road and the Malthouse Estate.</p> <p>WH4 goes on to refer to a site closer to the town centre that is appropriate for a larger retail outlet, although it is understood that the site is not within a designated retail centre. It would appear that the Council is using the draft Brief to make an allocation for a larger retail outlet; despite the most up to date retail study available (from 2009) concluding there is only limited capacity for additional retail floor space (Adur’s Planning Policy Section confirmed this in a consultation response to a mixed use/retail proposal on the Parcel force site as recently as 4th March 2013).</p> <p>We are aware the Council has commissioned a new retail capacity study. Whilst it is not impossible that a requirement for additional retail floor space has emerged since the previous study in 2009, Hansteen objects to using the draft Development Brief to make an allocation in this fashion. If the Council confirms the new retail requirement through the revised capacity study, the most suitable site within the Western Harbour may well be on the north side of Brighton Road, not least because of the limited amount of land available outside the flood plain on the south side outside.</p>
WH9	<p>WH9 seeks to set limits on building heights; in general, 4 storey apartments, 2.5 storey town houses and 2 storey retail pavilions. There appeared to be a number of participants in the workshop (reported on the night) who consider the heights suggested could be higher. Hansteen agree, particularly along Brighton Road, which would encourage better visual quality of the streetscape, (taking advantage of the central waterside location). It would also encourage higher</p>

	density and more sustainable patterns of development, close to the town centre and good public transport links. We consider you will agree Hansteen has demonstrated a desire to work closely with the Council in the redevelopment and regeneration of the Western Harbour area. We wish to continue with the approach and would welcome further discussions to resolve the concerns and objections set out above.
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3001

Individual

OTHER COMMENTS

Reference	Comments
	<p>I viewed the plans at the Shoreham Farmer's Market in February and spoke to a member [officer] of Brighton and Hove Council. My understanding from that conversation was that the drawings which were on display were only that and the buildings may bear no resemblance to the architects' drawings, for which I am grateful as they looked like something from the 60's. Also not shown on the drawings were definite points of access from the homes to the A259. As the congestion which will be caused by development will be considerable (for an already congested road) I would have expected far more detail with regards to access. Also, I saw no indication of any buildings other than houses and wondered what facilities there would be for a doctor's surgery and other essentials as the area already has a shortage of surgeries. I would therefore like to raise the following questions:</p> <ol style="list-style-type: none"> 1. How many access points will there be to the A259 and how will the traffic flow be managed? 2. Will there be other essential facilities such as a doctor's surgery? 3. How sustainable will the homes be? This is a golden opportunity for the councils to build energy efficient, sustainable homes and yet there was no indication of such intentions. These could be primarily south facing buildings and suited to solar panels. Can the councils stipulate that this will be a requirement in order for the plans to be given planning and building permission? If not, then why not. I refer you to a recent article [http://www.guardian.co.uk/lifeandstyle/2013/feb/08/homes-warm-welcome-passivhaus?INTCMP=SRCH] in <i>The Guardian</i> regarding reasonably priced energy efficient, attractive homes at debydalepassivhaus.co.uk. Given the traffic noise and pollution the home owners may well experience, this building method using triple glazing and a sophisticated ventilation system would seem very attractive and sensible. 4. What percentage of the housing will be social housing and/or shared ownership? 5. Would the councils consider building some council housing?

3002

Economy, Transport and Environment Department, East Sussex County Council

OTHER COMMENTS

Reference	Comments
	Thank you for consulting East Sussex County Council on the draft development briefs for Shoreham Harbour. The comments set out below are made on behalf of East Sussex County Council as mineral planning authority.

National policies require Mineral Planning Authorities (MPAs) to assess the need for existing, planned and potential wharf and rail facilities to be safeguarded and to encourage and promote the use of sustainable transport modes for the movement of minerals. Sustaining imports of marine aggregates through local wharves is particularly important in East Sussex and Brighton & Hove because of the scarcity of land based mineral resources in this area. As is recognised in both briefs, wharves at Shoreham Harbour make a significant contribution to meeting the need for aggregates imports into our Plan area.

The recently adopted (February 2013) Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove seeks to ensure safeguarding of wharf capacity as part of any development at the ports. Development proposals on land used for minerals wharfage for other uses would need to demonstrate that sufficient alternative mineral wharf capacity (tonnage) is deliverable and available to meet needs in the Plan Area for the plan period, before the Authorities would accede to alternative development of such a site. Policy WMP15 in the Plan sets out the detailed requirements. The Plan is available to view on our website at <http://consult.eastsussex.gov.uk/>.

Aldrington Basin is located within the Waste and Minerals Plan area, and the Western Arm is situated close to the Plan boundary, and both contain mineral wharves. East Sussex County Council would therefore like to see that the aim of the safeguarding policy (WMP15) is enshrined within the development briefs.

The future of the mineral wharves is discussed at 5.3.16/17 in the Aldrington Basin Development Brief and 5.3.23-27 in the Western Arm Brief. The principle of safeguarding capacity within the Port appears to be accepted although no detailed mechanism for doing so is set out. It is assumed that this matter is considered more appropriate for inclusion in the emerging JAAP for Shoreham Harbour. We would be grateful for confirmation on this point. East Sussex County Council would be pleased to discuss a way forward on this with the partner authorities.

I would also like to make two detailed points on the Western Arm brief:

5.3.24 – It is suggested that several existing larger safeguarded mineral sites with unused capacity could mitigate the loss of wharves elsewhere, and consolidation reflects a trend towards larger operations and a decline in smaller wharves. Whilst this trend may be evident, any re-provision of capacity should try to ensure that sites are not limited to, or controlled by, particular operations or suppliers which could lead to inflexibility and vulnerability for minerals capacity.

5.3.25 states that not all active wharfs are safeguarded in the West Sussex MLP in this area. However, the more recently published NPPF requires MPAs to safeguard existing, planned and potential wharfage. In this case, I would suggest that the situation could be reviewed to assess whether safeguarding arrangements should now apply to all mineral wharves, not just those previously identified.

I hope these comments are of assistance to you. Please let me know if you wish to discuss any of the points further. It should be noted that this is an Officer level response to the draft Development Briefs and the comments made have not been before Members of East Sussex County Council.

3003

Environment Agency

OTHER COMMENTS

Reference	Comments
	<p>Thank you for consulting the Environment Agency on the Draft Development Briefs. We have appreciated the opportunity to work closely with you on the preparation of these documents given the significant environmental constraints associated with the development.</p> <p>We are pleased to see that the need for a clear strategy for flood risk mitigation and management is recognised. We have been working closely with you in the preparation of the Draft Development Briefs and we look forward to this continuing.</p> <p>We are also supportive of the proposed inclusion of the sustainability checklist. This will enable all development, regardless of size or scale to give consideration to and incorporate wider sustainability measures.</p>
WHA	We encourage the aim to create a waterfront environment and support the inclusion of Objective 6, specifically the intention to reduce the risks of flooding.
1.3.1	Please note that paragraph 1.3.1 should refer to the 'Rivers Arun to Adur - flood and erosion management strategy' this is the strategy that covers the Western Arm.
5.2.5	We are pleased to see there recognition that long term maintenance needs to be addressed.
WH12: Ecology, biodiversity and water	We support the inclusion of this section which ensures that biodiversity is conserved, protected and enhanced, and that proposals incorporate opportunities to maximise ecological opportunities. This will also help deliver objectives of the Water Framework Directive (WFD), and we are pleased to specific reference made to this.
5.3.8 / 5.3.18	We support the inclusion of the requirement for all developments to incorporate Sustainable Drainage Systems (SuDS). The proposed sustainability checklist provides a means by which this can be implemented for all development proposals (not just those requiring FRA). However we recommend that this is amended to read 'appropriate SuDS...'. This also relates to paragraph 5.3.18.
5.3.9	Paragraph 5.3.9 highlights the multi-functional benefits of SuDS. This will help ensure that links are made between flood risk, water quality, ecology and wider sustainability issues and encourage opportunities to be taken to deliver environmental benefits.
WH13: Flood Risk Management	This section sets out clear principles and requirements for development. This will help ensure that proposals coming forward assess and consider flood risk appropriately.
5.3.12	We agree with and support the options identified. However consideration should be given to whether you wish to protect any road on the frontage from flooding, as this would rely on both land raising and defences.
5.3.13	We agree with this paragraph, the way it is written will mean that it will remain accurate over time.

5.3.15 and 5.3.18	These paragraphs need amending as they are currently not consistent with the NPPF. All proposals within Flood Zones 2 or 3, or major development within flood Zone 1 are required to submit a FRA.
WH18: Contamination	We support the comments provided in relation to contamination and the links highlighted to other aspects of including surface water drainage and land raising.
5.3.30	We recommend that paragraph 5.3.30 is amended to read the following: "It is expected that applications for sites immediately adjacent to contaminated sites will also need to submit a risk assessment for the potential of contamination. This assessment must be provided where remediation is required. Any remediation scheme must be submitted for approval." In respect of suitable remediation schemes, any design must be appropriate to manage the identified risks at the site; this will include the proposed end use.
SPAB	Please see our general comments for each section of the Western Harbour Arm Draft Development Brief. Some of these will also be relevant for this area. In addition we have the following specific comments:
SPAB11: Ecology, Biodiversity and Water	We recommend that the paragraphs included within the Western Harbour Arm Draft Development Brief as part of WH12 are also included here, specifically paragraph 5.3.7. This will help ensure consistency across the two areas.
SPAB12: Flooding	We agree with the assessment of flood risk at both Aldrington Basin and South Portslade Industrial Estate contained within this section as well as 3.5 (Site Topography and Flooding). South Portslade Industrial Estate is well above the predicted flood level. We are also pleased to see recognition of surface water flood risks. In relation to paragraph 5.3.10, we recommend that reference is made to the sequential approach and the suitability of development types in relation to flood risk as advocated by paragraph 103 of the NPPF.
SPAB16: Contamination	Please see our above comments relating to WH18 (Western Harbour Arm). We recommend that 5.3.19 is also amended as per our suggestion.
Both Briefs	Overall we consider that both Draft Development Briefs give a clear overview of the environmental and wider sustainability issues that may affect development in these areas. I hope the above is helpful however if you have any queries or require any further information please contact me.

3004

Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? Not entirely	
Reference	Comments
	The ideas in the plan seem well thought out with the exception of the infra-structure plan and minor arrangements of the business/ housing locations. See. Section 2.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	

Reference	Comments
Business / housing locations	<p>One has only to look at the A259 at the bottom of Boundary Road to see how unpleasant even two story buildings can make the coast road, if there is no set back. To build four story blocks along Kingsway, between Hove Lawns and Boundary Road, will produce a dull dark area throughout the winter months. Especially as there is no room to allow set-back on the Kingsway side.</p> <p>It seems especially perverse as other parts of the report express reservations about building houses near to the working part of the port. I live about two hundred yards inland from one of the areas where unloading takes place and I can still hear some noise from these activities. I do not find it a problem but others may.</p> <p>Why not turn the whole of the South Portslade industrial area, between Boundary Road and Trafalgar Road, into housing and use the North Basin Road area into a small business site for low level roadside development? Preferably not shops. Boundary Road has too many business failures to need more competition. Better to keep that area thriving than to add another set of marginally viable shops along the Kingsway.</p>
Logistics	<p>Rather more indication that logistics problems have been fully considered would be reassuring. If they have not then the proposals are fundamentally flawed.</p>
Utilities	<p>Although the last year has produced an excess of rain, and presumably topped up reservoirs, the previous years had been exceptionally dry with drought restrictions in place. With more businesses and housing (however sustainable) more water will be needed. Where will it come from if the dry trend continues? The Adur might be a source of supply, if didn't upset the local ecology, but a water treatment plant would be needed. Should space be reserved for a desalination plant that could sell clean water to the local water company? Has Southern Water sufficient capacity to cope with increased sewerage?</p> <p>Can the area cope with increased recycling and rubbish generation?</p> <p>Where will the electric and gas supplies come from. Even sustainable buildings need some outside assistance, as will manufacturing businesses. No doubt the local utility companies have been consulted, but I could find nothing in the proposals to cover this topic.</p>
Education	<p>The addition of circa 1000 new homes will require more school places and facilities for young people to amuse themselves. Are there any plans to reserve land for education purposes? I have been told that there is a shortage of school places in the Hove area, what is the situation to the west of this area and in Shoreham? Will children have to travel long distances to schools, thus increasing traffic congestion and the length of the school day.</p>
Leisure	<p>It is good to see that some open spaces, for recreation, have been included in the report The area between Worthing and central Hove is not well supplied with places of entertainment for children and teenagers. Could some part of the port area be reserved for people to learn sailing, or similar activities? I'm aware that some training activities take place, but there will be more people in need of leisure facilities.</p> <p>What will people do for entertainment in inclement weather? There are cinemas only in central Brighton and Worthing, which would require a long and possibly expensive journey. Apart from pubs and restaurants, are there any indoor</p>

	entertainment facilities around the port area? The addition of 1000+ households in need of leisure occupation necessitates some effort to supply their needs. Can some incentive be offered to one of the cinema chains to build a cinema and leisure or indoor sports complex in the port area?
Traffic	<p>The aspiration of persuading people to move from private car usage is admirable, but unlikely to reduce traffic in the area by any significant degree. As a non-car owner, with kind car-owning friends, I know how much cheaper and more convenient car transport is. Car clubs cannot cater for peoples' liking for using a car as an extra room for car-related storage. Even if these feelings can be overcome the following points need to be taken into consideration.</p> <p>While many young people may wish to follow a green life style, the realities of life, children, expensive public transport, and commuting to work (even if most of the journey is by rail) will eventually push many of them into car ownership. If only 50% of the new homes keep a car, that will still mean a considerable addition to journeys on already congested roads.</p> <p>It seems likely that free bus passes for pensioners will be discontinued or restricted by the next government. This will probably result in more senior citizens using their cars for local journeys.</p> <p>Has any survey been made of the numbers using cycle routes on Brighton and Hove seafront? I frequently travel along Kingsway and the paths are not heavily used. There seem to be more cycles on New Church Road (many on the pavement) and on the seafront area than on the paths. Bicycle routes may be used in fine weather, but the number of people returning to their cars in winter is likely to add to congestion</p> <p>The Harbour plan will hopefully bring a number of new businesses to the area. Even if these do not involve manufacturing, they will require servicing, delivery of office supplies etc.. Manufacturing businesses will need to receive raw material and ship manufactured goods. Some of this will, hopefully be carried by water, but the area already suffers from heavy lorries and other traffic may well increase. For example small and medium sized vans carrying goods to the local rail stations for transmission. Can the local rail network handle more goods?</p> <p>The consultation document recognises that the roads in this area are already overused. The new north port side road will help to some degree, but unless it runs the full length of the port, from Shoreham to Hove Lagoon which is probably impractical, it has the potential to create even bigger bottlenecks than at present. Were I considering a business start-up in the area, transport logistics would be a major concern. Pious hopes of shifting people to public transport will not work and allowing development that may later have to be demolished to improve road access would be wasteful. Better to try to get it right at the beginning or defer the finalization of the plan until the emerging transport strategy is clearer.</p>
Security	I can find no mention in the report of security. Some years ago there were large demonstrations about the shipment of meat animals across the Channel. This produced considerable upheaval and vandalism in the Basin Road area. In these days of terrorist attacks, have the risks of opening access routes to the port, and of putting households so near the port facilities, been considered?
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments

3005**Natural England****OTHER COMMENTS**

Reference	Comments
Portslade and Aldrington Basin	<ul style="list-style-type: none"> • NE welcomes the objectives of the development brief, notably 1, 5, 6 and 7 and particularly the commitment to “incorporate innovative approaches to open space and biodiversity” and to “protect and enhance the area’s important environmental assets and wildlife habitats including the Site of Special Scientific Interest (SSSI), Royal Society for the Protection of Birds (RSPB) reserve, Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR) and the Village Green at Kingston Beach”. • NE recognises (para 2.1.4 of the Brief) that the seafront promenade ends at the Hove Lagoon and welcomes work to provide access to the coast, wherever possible. Local Planning Authorities must have regard to the NPPF which encourages improved public access to the coast and ensures new development does not hinder the creation of the Coastal Route. Natural England’s approach is to work constructively with planners and developers with the aim of ensuring that development plans and planning proposals take account of our coastal access objectives and make provision for them wherever appropriate. More details of the project are available on the following link. http://publications.naturalengland.org.uk/publication/35035?category=50007 • The brief needs a clear picture of proposals for open spaces and related facilities, in order that the development of individual sites can make appropriate spatial and financial provision. • NE supports SPAB11 and the aspiration to provide net gains to biodiversity and make reference to Biodiversity Action Plan species and habitats, and the methods set out the related text.
Western Harbour Arm Development Brief	<ul style="list-style-type: none"> • NE welcomes the objectives of the development brief, notably 1, 5, 7 and 8, particularly the commitment to “promote healthy and enjoyable living by improving existing and providing new open spaces, green links, leisure and recreation opportunities. To improve connections to and use of the waterfront, coast and beaches as attractive destinations for both locals and visitors” • See bullet point above re the Coastal Route • NE supports the new waterfront pedestrian/cycle route shown in figure 5.4 • NE welcomes reference in para 3.7.1 “to a number of designations which constrain development a locally designated nature reserve (LNR) and Site of Nature Conservation Importance (SNCI) at Shoreham Beach; and a nationally designated Site of Special Scientific Interest (SSSI) stretching into the Adur Estuary. • Whilst the aspirations to provide net gains in biodiversity (para 5.3.6) and to ensure only clean surface water is discharged into the River Adur (para 5.3.7) are welcomed, it is important that the impacts of development on

	<p>designated sites (including issues for the SSSI such as recreational disturbance) are considered and appropriate mitigation identified, along with the means for its delivery and maintenance. It would be helpful for the results of this work to be reflected in the Briefs. The NPPF (para 118) indicates that "... proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;"</p>
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3006

West Sussex County Council

OTHER COMMENTS

Reference	Comments
	<p>Adur District Council and Brighton & Hove City Council have jointly commissioned consultants to prepare development briefs for key areas of change within the Shoreham Harbour Regeneration Area. The briefs will provide detailed planning guidance for these areas and will also inform the preparation of the Joint Area Action Plan (JAAP). This note sets out West Sussex County Council's officer response to the public consultation.</p> <p>As a key member of the Shoreham Harbour Regeneration Partnership, the County Council broadly welcomes an approach to planning that provides businesses, developers and investors with increased certainty. The development briefs have addressed previous comments raised by the County Council regarding the principle of safeguarding mineral wharves within Shoreham Harbour, however, details of the release/replacement of wharves is not included and should be addressed through the JAAP and the review of the West Sussex Minerals Local Plan. Until that time, Policy 40 of the Minerals Local Plan (2003) still remains the adopted planning policy for safeguarding wharves within the harbour and the briefs should not be afforded weight in determining planning applications on safeguarded wharves. The County Council is committed to working with the Shoreham Harbour Regeneration Partnership to ensure an appropriate policy approach is included in the JAAP and Minerals Local Plan.</p> <p>The draft development briefs have been informed by an emerging transport evidence base which is being prepared to support regeneration and development at Shoreham Harbour to ensure that the impact of strategic development is adequately assessed. The Adur Local Plan & Shoreham Harbour Transport Study is nearing completion and is expected to be published in a final report which will be available as supporting evidence for the planned consultation on the draft Adur Local Plan this summer. This study will inform the emerging Shoreham Harbour Transport Strategy, which is currently being prepared by the County Council and will include the area of the harbour within Brighton & Hove. The strategy will contain a set of integrated transport measures that will guide the provision of transport infrastructure in the area for the next 15 years. The strategy will include improvements to the existing road network and</p>

	<p>measures to encourage the use of sustainable modes of transport. These measures will be comprised of infrastructure and behaviour change initiatives where these would be considered effective and appropriate. The emerging strategy has informed the preparation of these development briefs, but further work is required to ensure that the strategy is sufficiently reflected in the transport improvement policies.</p>
Western Harbour Arm	<p>The County Council is commissioning a Shoreham Town Centre Study to prepare designs for local highway improvements in this area. The findings of this study will inform the emerging Shoreham Harbour Transport Strategy and will assist the Adur County Local Committee (CLC) with the identification of schemes to be progressed as local priorities.</p> <p>The County Council is preparing a Strategic Infrastructure Package for Adur which will include improvements required to enable the provision of County Council services to meet the needs of new strategic development. This package will inform the Infrastructure Delivery Plan for the District and will include infrastructure required to support development in the Western Arm.</p> <p>Development of this scale in this locality would require provision of the following education infrastructure:</p> <ul style="list-style-type: none"> • Early Years (0 – 4): Development of this size would create the need for an additional 26 places full day care nursery requiring approximately 80sqm. • Primary Sector (4 – 11): Would produce an additional 256 primary aged pupils requiring in excess of 1 form of entry per year of age (36 places per year of age). A new school site would be required in addition to financial contributions to provide additional primary school places within the locality. • Secondary Sector (11 – 16): Financial contributions would be required to create an additional 184 places through likely expansion of existing schools within the locality – subject to site and feasibility studies as well as public consultations. • Youth Services (16 – 18): Financial contributions towards expanding local provision for an additional 74 pupils. <p>These figures have been based on the number of dwellings that are proposed for Shoreham Harbour within Adur District within the Local Plan period. When assessing the Shoreham Harbour development as a whole based on current assumptions that extend beyond this time period and into Brighton & Hove, it is likely that an additional form of entry will be required for primary pupils together with additional contributions for the other education services included above.</p>
Introduction	<p>1.3.1(9): It is welcomed that the brief acknowledges the importance of protecting and enhancing the area’s historic assets including Shoreham Fort scheduled ancient monument, the lighthouse and the Conservation Areas.</p>
Constraints and Opportunities	<p>3.2.2: In addition to the general principle set out in Place Making and Design Quality, the importance of the Conservation Area and grade I listed St. Mary de Haura as the ‘key landmark feature in the town’ is recognised – the church tower and flagstaff creates a focal point to the historic port settlement and new development should respect this traditional status and avoid overwhelming it in either height or mass.</p> <p>Figure 3.3: It is suggested that this diagram is updated with the findings of the Adur Local Plan & Shoreham Harbour</p>

	<p>Transport Study. It is unclear what is meant by ‘problematic junctions’ – this should be clarified for example, where there is a capacity issue.</p> <p>3.3.1: Although there are proposals in the emerging Shoreham Harbour Transport Strategy to potentially increase the frequency of bus services, current frequency is not highlighted as a key issue. The increase would be to support future development by providing enhanced sustainable transport opportunities.</p> <p>3.5.1: The brief notes that the ‘Western Harbour Arm occupies a distinctive position between the backdrop of the South Downs which rises behind the study area and the coastline of the English Channel.’ In the case of the existing Parcelforce building the outline of the downs can be traced continually above the existing roof pitch when viewed from the south side of the harbour/north shore of South Beach. Although it will be difficult to preserve the present visual link in new development it should be an ambition to preserve this as far as possible and design in sufficient ‘strategic visual gaps’ in the new build for the observer to make the connection and read the landscape form. In design terms this issue is also linked with the north-south connectivity in section 5.2 (paragraph 5.2.3) and in WH8 ‘Open Urban Blocks’ where the southern edge of the proposed new development is intended to be restricted in height to two storeys.</p>
Guiding Principles	<p>5.1.1(3): One of the sites to the north of the A259 (Phase 3 area on the indicative phasing plan – Fig 5.1) is the County Council’s Shoreham Household Waste Recycling Site (HWRS). Redevelopment of that site as part of a residential development (para 5.1.1(3) suggests this would be towards the end of the plan period at the earliest) would require its replacement elsewhere.</p> <p>5.2.2: The new waterfront route should be designed to ensure that the potential for rat-running is minimised. To achieve a high quality public realm, it is suggested that the presence of on-street parking is kept to a minimum.</p> <p>5.3.25: The development brief has incorporated the amended text suggested by the County Council prior to the public consultation period. It is suggested that the following sentence is added to the end of Paragraph 5.3.25: ‘WSCC is commissioning an update to the Wharves and Railheads Study which will include a strategy for dealing with the release/replacement of sites and will provide evidence for the JAAP’.</p> <p>5.3.31: Please omit the following: ‘Contributions will be negotiated between the developer and the council’.</p> <p>(vi) It is understood that pedestrians and cyclists will be given priority over vehicular traffic on residential roads. It should be noted that there is an expectation that the A259 will continue to provide for a significant volume of vehicular traffic and function as a Local Lorry Route.</p>
Sustainability Appraisal	<p>SA Objective 13: The commentary should be updated with the findings of the Adur Local Plan & Shoreham Harbour Transport Study.</p>
South Portslade Industrial Estate and Aldrington	<p>3.3.1: Although there are proposals in the emerging Shoreham Harbour Transport Strategy to potentially increase the frequency of bus services, current frequency is not highlighted as a key issue. The increase would be to support future development by providing enhanced sustainable transport opportunities.</p> <p>5.3.17: The development brief has incorporated the amended text suggested by the County Council prior to the public consultation period. It is suggested that the following sentence is added to the end of this paragraph:</p>

Basin	<p>'WSCC is commissioning an update to the Wharves and Railheads Study which will include a strategy for dealing with the release/replacement of sites and will provide evidence for the JAAP'.</p> <p>SPAB17: As with policy WH19 for the Western Arm brief, this policy should refer to the Shoreham Harbour Transport Strategy.</p> <p>Availability of parking spaces has been identified as a key issue in section 3.3.1. However, there is no reference to car parking standards or strategies in this policy. The County Council will work with Brighton & Hove City Council to establish an approach to address car parking issues through the emerging Shoreham Harbour Transport Strategy.</p>
Green space	<p>It is welcomed that the development brief for the Western Harbour Arm includes new green spaces, but these do not appear to be actually linked. Green roofs / walls would help but so too would some tree planting within the open urban blocks and also street trees.</p> <p>The sustainability appraisal (6.3 last bullet point) makes specific reference to 'ensuring the provision of an interconnected (my emphasis) network of multi-functional public open space and green infrastructure that sits within a strategic framework.'</p> <p>There just appears to be something of a disjunct between the brief and the appraisal on this point.</p>

Appendix 3: Issues, responses and amendments

Comments / Issues	Officer Response	Amendments to the Brief
General Comments		
Comments generally supporting the proposals	Comments noted.	No change.
The project is a waste of money	Comments noted	No change
Question the status of the Development Brief.	The Development Brief is not a DPD or an SPD. However it will be afforded weight as a material consideration in planning decisions given the amount of technical background and engagement undertaken. The contents of the brief will be shortly subsumed in to the harbour-wide JAAP which will subject to public examination and DPD procedures. Please note that the brief has been subject to an SA and the consultation has exceeded the requirements for an SPD.	No change
Concern that the marine / port character of the area is maintained	The Overview section highlights the importance of the marine / port character of the area and states that this has been considered during the preparation of the brief. However, the Illustrative Framework does not mention this.	These issues are now addressed in two new principles: WH22: Facilities for boat users, and WH28: Waterfront character.
Concern about the lack of detail in the brief.	The purpose of the brief is to set out a high level illustrative strategy and further detail will be provided through the emerging JAAP process and subsequent smaller area projects and proposals.	No change
Vision and Objectives		
The vision and objectives may be realistic in a stronger economy.	Comments noted.	No change.
Illustrative Framework		
The number of residential units is an over	Comments noted.	No change

development of the area.		
The majority of dwellings are along Brighton Road (A259). They will not benefit from a riverside location and will suffer from considerable road noise.	The illustrations are indicative and are not intended to represent a fully designed scheme. Principle WH8 (Development Form) proposes a number of types of urban blocks, depending on the depth of the site from the waterfront to Brighton Road. Many of these blocks do feature a frontage onto Brighton Road. However, principle WH2 states that single aspect north-facing flats must be avoided. South facing habitable rooms will have views across the amenity space and the river. Noise is addressed in principle WH14: Noise.	The design, layout and form of development are now addressed in principles WH24: Development Form and WH25: Design Quality. Noise is now addressed in principle WH6: Noise. This has been amended to reflect the Planning Noise Advice Document: Sussex (2013). Principle
The northern side of Brighton Road (A259) should also be included.	The indicative phasing plan suggests that the area to the north of Brighton Road has the potential for redevelopment in the longer term. This does not preclude the redevelopment of these sites should they become available. The principles in the development brief apply to the whole of the development brief area.	Section 4 acknowledges the possibility of sites to the north of Brighton Road becoming available for redevelopment during the plan period.
Employment		
Include a hotel	Adur and Worthing Councils have commissioned a Hotel and Visitor Accommodation Study. The findings of this study will inform the JAAP.	Section 4 now acknowledges the potential of locating a hotel in this area.
Temporary employment uses	Temporary planning permissions may be granted in accordance with the adopted Interim Planning Guidance for Shoreham Harbour.	Temporary planning permission is addressed in principle WH12: Impact on existing business operations.
Principle of retail development	Proposals for retail uses must comply with local and national planning policies. Draft policy 26 in the emerging Adur Local Plan requires a retail impact statement for	Section 4 of the Development Brief addresses retail uses. The area of the harbour closest to Shoreham-by-Sea town centre has been

	<p>proposed retail development with a floorspace of 1,000m².</p>	<p>considered in relation to a larger retail outlet as part of a mixed-use scheme. The Retail Study completed in 2009 indicated that there was limited capacity for additional convenience retail floorspace, however, it recommended that Shoreham town centre as a whole would benefit from a new quality national food store operator trading either in or on the edge of the primary shopping area. Following the recent resolution to grant planning permission for a mixed use development on the former Parcelforce site a significant proportion of the identified capacity would be taken by the proposed ground floor retail store on this site. Whether any additional convenience retail floorspace could be justified would depend on the forthcoming review of the 2009 study and the emerging Adur Local Plan. Any proposal coming forward in advance of the Local Plan would have to demonstrate compliance with relevant Development Plan policies and the NPPF, in particular, that the development would not have an adverse impact on the vitality and viability of the town centre and would deliver significant regeneration benefits.</p>
<p>Concern that the aim of improving training and skills has been lost</p>	<p>Strategic objective 3 (Economy and Employment) includes equipping local communities with training and skills. Shoreham Harbour Regeneration will</p>	<p>A new principle has been added. WH13: Training and Skills directly addresses this issue.</p>

	continue to work with local further education colleges to identify skills and training needs.	
Residential		
Include affordable housing	Comments noted. WH2 requires that residential development includes a range of tenures and sizes. It also states that the approach to providing affordable housing should be in accordance with Draft Policies 20 and 21 in the emerging Adur Local Plan. This is also addressed in the Interim Planning Guidance on Planning Contributions For Infrastructure Provision	Affordable housing is now addressed in Principle WH14: Affordable housing, tenure, size and unit types.
Transport / Parking		
Concern over lack of parking provision.	<p>Principle WH2: Residential Uses in the Draft Development Brief requires the inclusion of innovative solutions for car and cycle parking. The plans and illustrations are purely indicative and do not therefore show the detailed parking arrangements.</p> <p>The brief requires development proposals to be accompanied by a Sustainability Statement. This includes the provision of sufficient car parking spaces in accordance with <i>WSCC Guidance on Car Parking in Residential Development</i>.</p> <p>Policy 14 (Quality of the Built Environment and Public Realm) in the Draft Adur Local Plan (2012) states that development proposals must have acceptable parking arrangements (in terms of amount and layout).</p> <p>Local standards for parking provision will be summarised in the emerging Shoreham Harbour Transport Strategy which will form</p>	Parking is now addressed in principle WH17: Promoting Sustainable Transport

	part of the JAAP.	
Provide car club parking spaces.	Section 3.3 notes the possibility of introducing car clubs parking spaces.	No change.
Improve transport infrastructure	<p>Principle WH19 in the Draft Development Brief includes the requirement for development proposals to contribute towards sustainable transport measures. This reflects Draft Policy 27 (Transport and Accessibility) in the emerging Adur Local Plan.</p> <p>The Shoreham Harbour Transport Study will inform the consideration of sustainable transport options to adequately mitigate the impact of strategic development. Preliminary results indicate that with appropriate mitigation measures the existing road network will be able to cope with the proposed level of new development.</p> <p>This study will inform the emerging Shoreham Harbour Transport Strategy, currently being prepared by West Sussex County Council. The strategy will contain a set of integrated transport measures that will guide the provision of transport infrastructure in the area for the next 15 years.</p> <p>The Shoreham Harbour Transport Strategy will include improvements to the existing road network and measures to encourage the use of sustainable modes of transport. These measures will be comprised of infrastructure and behaviour change initiatives where these would be considered effective and appropriate.</p>	Transport Infrastructure is now addressed in principle WH18: Transport infrastructure contributions
Widen Brighton Road (A259)	Whilst development at Shoreham Harbour will require some investment in the road network,	No change.

	substantial new road building or widening is unlikely to be deliverable on both environmental and cost grounds.	
Build a new link road between the A259 and A27	At present neither WSCC nor BHCC intend to build a new access road between the A259 and the A27. The transport benefits that could be achieved through a new link road have been shown to be significantly outweighed by cost and environmental considerations.	No change
Sustainability		
Use Passivhaus standard.	<p>The Development Brief and the emerging Adur Local Plan set minimum standards in relation to the Code for Sustainable Homes (CSH). This is the national standard for the sustainable design and construction of new homes. It aims to reduce carbon emissions and promote higher standards of sustainable design above the current minimum standards set out by the building regulations. The code provides nine measures of sustainable design:</p> <ul style="list-style-type: none"> • energy/CO2 • water • materials • surface water runoff (flooding and flood prevention) • waste • pollution • health and well-being • management • ecology <p>It uses a 1 to 6 star system to rate the overall sustainability performance of a new home against these 9 categories. Proposals in Adur</p>	No change

	<p>will be required to meet Level 4. Passivhaus sets a high standard in relation to energy use and CO2. Although it does not cover all measures of sustainability included in the CSH, Passivhaus is considered equivalent to CSH levels 4 or 5. Development Proposals applying the Passivhaus principles would be welcomed, although they would also be required to demonstrate that they meet the other sustainability requirements in the appropriate brief or local plan.</p>	
Biodiversity		
Include recreational disturbance as an impact on designated sites.	Agreed	This is now addressed in principle WH20: Ecology and Biodiversity
Infrastructure and Utilities		
Impact on infrastructure, including water and sewerage	<p>The brief states that development proposals will be required to make contributions to infrastructure in accordance with ADC's planning contributions guidance. This includes water distribution and sewerage. The emerging Adur Local Plan and the Development Brief for the Western Harbour Arm propose approximately 1,050 homes, whilst identifying the potential for additional residential development beyond the plan period. Principle WH5 addresses the provision of social infrastructure. Draft Policy 28 in the emerging Adur Local Plan (2012) also requires development to provide or contribute to the provision of facilities, infrastructure and services through S106 Planning Obligations or a future CIL. ADC has also produced Interim Guidance on Planning Contributions For Infrastructure</p>	Infrastructure delivery and provision of utilities are addressed in principle WH9: Infrastructure and Utilities.

	Provision. WSCC is preparing a Strategic Infrastructure Package for Adur which will inform the Infrastructure Delivery Plan for the district.	
Social Infrastructure		
Impact on social infrastructure, including schools, youth facilities, community buildings and open space.	<p>The brief states that development proposals will be required to make contributions to social infrastructure in accordance with ADC's planning contributions guidance. This includes additional nursery, primary and secondary education places.</p> <p>The emerging Adur Local Plan and the Development Brief for the Western Harbour Arm propose approximately 1,050 homes, whilst identifying the potential for additional residential development beyond the plan period. Principle WH5 addresses the provision of social infrastructure.</p> <p>Draft Policy 28 in the emerging Adur Local Plan (2012) also requires development to provide or contribute to the provision of facilities, infrastructure and services through S106 Planning Obligations or a future CIL.</p> <p>ADC has also produced Interim Guidance on Planning Contributions For Infrastructure Provision. WSCC is preparing a Strategic Infrastructure Package for Adur which will inform the Infrastructure Delivery Plan for the district.</p>	Social Infrastructure is now addressed in principle WH16: Contributions to Social Infrastructure. This includes reference to schools, youth facilities and community buildings. Open space is addressed in WH23: Public Open Space.
Leisure / Recreation		
Provide / improve public hards and slipways to utilise the river.	Comments noted. Additional detail will be added.	A new principle has been added. WH22: Facilities for boat users addresses these issues
Sustainability Appraisal		

<p>SA in relation to objective 19 is inadequate and not robust (particularly in relation to retail)</p>	<p>The Sustainability Appraisal panel considered the Western Harbour Arm a suitable location for new development including additional services and facilities. This view is also supported by the Sustainability Appraisal of the emerging Adur Local Plan. The impacts of development in this location were considered uncertain as this will depend on the detail of individual development proposals. The commentary on SA objective 19 makes no reference to retail.</p>	<p>No change</p>
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