



**SHOREHAM  
HARBOUR  
REGENERATION**

**Sustainability Statements Guidance Note**

**Shoreham Harbour Regeneration Area  
(Adur District Council)**

**July 2013**

**ADUR**  
DISTRICT COUNCIL





# 1. Purpose and Status of this Guidance Note

- 1.1. The purpose of this document is to provide prospective applicants with guidance on the format and content of Sustainability Statements, which are required for development proposals within the Shoreham Harbour regeneration area. It also provides a summary of the planning policy requirements in relation to sustainability.
- 1.2. The Shoreham Harbour Interim Planning Guidance (IPG)<sup>1</sup> requires all development proposals within parts of the Shoreham Harbour Regeneration policy area in Adur District to be accompanied by a Sustainability Statement. This requirement is reiterated in Principle WH1: Sustainability Statements in the Western Harbour Arm Development Brief (2013).
- 1.3. This guidance applies only to the parts of the Shoreham Harbour regeneration area that fall within Adur. Brighton & Hove City Council (BHCC) requires all development proposals to be accompanied by a completed Brighton & Hove Sustainability Checklist.
- 1.4. The IPG recommends using the BHCC Sustainability Checklist along with Eco-Towns: A supplement to Planning Policy Statement 1(2009) as guidelines for standards required for development. However, since the production of the IPG, BHCC has revised its Sustainability Checklist to specifically reflect BHCC's policies and priorities.
- 1.5. As such it is no longer appropriate to use this checklist for development in Adur. It is therefore considered necessary to provide specific guidance on Sustainability Statements for the portion of the regeneration area in Adur.
- 1.6. This guidance note does not establish new planning policy but signposts to the existing and emerging policy framework. It is intended to be an evolving document which will be updated periodically to reflect changes in the planning policy framework.
- 1.7. The remainder of this document is structured around a number of topics. Each section summarises the policy requirements for that topic. This is followed by a number of questions. The Sustainability Statement should answer all of these questions. A detailed justification must be included for any aspect of the proposed development which does not meet the policy requirements in this document.
- 1.8. The Sustainability Statement will be used to inform pre-application discussions and Development Management recommendations for new development within the Shoreham Harbour Regeneration area.

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<sup>1</sup> *Shoreham Harbour Interim Planning Guidance* (Shoreham Harbour Regeneration: 2011)

## 2. Sustainability Statement Guidelines

### General

1. What is the gross residential internal floorspace of the development?
2. How many residential units are included in the development?
3. What is the gross non-residential internal floorspace of the development?

### Building standards

The government has proposed increasingly tighter building regulations over time so that all new development should be zero carbon by 2016.

Policy 18: Sustainable Design in the *Draft Adur Local Plan (2012)* and Principle WH2: Building Standards in the *Western Harbour Arm Development Brief (2013)* require all new residential development to achieve Code for Sustainable Homes level 4 as a minimum. Conversions and non-domestic development are required to achieve BREEAM 'Very Good' Standard as a minimum.

1. Does the development proposal meet local policy requirements in terms of building standards?
  - If so, please provide details.
  - If not, please justify.

2. What is the Code for Sustainable Homes standard sought for the residential elements of the proposed development?
  - Number of units Level 4
  - Number of units Level 5
  - Number of units Level 6
  - Other, please specify standard.
3. What is the BREEAM rating sought for the non-residential elements of the development?
  - Number of units 'Very Good'
  - Number of units 'Excellent'
  - Number of units 'Outstanding'
  - Other, please specify standard:

### Energy

Policy 17: The Energy Hierarchy in the *Draft Adur Local Plan (2012)* and Principle WH3: Energy in the *Western Harbour Arm Development Brief (2013)* require all development proposals to be accompanied by an energy assessment. This should include information on the predicted energy demand and carbon dioxide emissions for the site and subsequently how these have been reduced using the energy hierarchy of:

1. Demand reduction
2. Efficient energy supply
3. Renewable energy provision

Deviation from this hierarchy approach must be fully justified as part of the energy assessment.

Policy 18: Sustainable Design in the *Draft Adur Local Plan (2013)* and Principle WH3: Energy in the *Western Harbour Arm Development Brief (2013)* require development proposals to include the installation of energy efficient fittings and appliances.

1. What is the energy performance of the most common dwelling type?
2. What is the energy performance of the non-residential units?
3. Will post-occupancy evaluation of energy performance of the development be undertaken?
  - If so, please provide details.
  - If not, please justify.
4. Have measures been incorporated into the development proposal to reduce demand for energy?
  - If so, please describe.
  - If not, please justify
5. Have measures been incorporated into the development proposal to increase the efficiency of energy supply?
  - If so, please describe.
  - If not, please justify
6. Have measures been incorporated into the development proposal to provide energy from renewable sources?
  - If so, please describe.
  - If not, please justify.
7. Does the proposal include the installation of energy efficient fittings and appliances?
  - If so, please describe.

- If not, please justify.

## Passive Design

Policy 17 in the *Draft Adur Local Plan (2012)* requires development proposals to demonstrate how they will reduce demand for energy. This includes measures such as passive design. Principle WH31: Energy in the *Western Harbour Arm Development Brief (2013)* also requires new development proposals to include passive design measures. Passive design includes, but is not limited to the following considerations:

### Orientation and layout:

- Single aspect, north-facing flats must be avoided.
- Habitable rooms, such as living rooms, should be placed on the southern side of the building.
- Non-habitable rooms, such as kitchens and bathrooms, should be placed on the northern side of the building

### Glazing and sunlight:

- All rooms should have natural light.
- The majority of windows should be south facing or within + / - 30° of south facing.

### Thermal mass:

- Appropriately located exposed thermal mass should be incorporated into the development.

### External shading:

- Developments should include appropriate external shading on the southerly, easterly and westerly faces of the building.

### Ventilation:

- Developments should include appropriate ventilation measures, with a preference for non-mechanical ventilation where possible.

Principle WH24: Design Quality in the *Western Harbour Arm Development Brief* (2013) requires development proposals to avoid single-aspect, north-facing homes and to maximise opportunities for dual-aspect homes.

1. Have passive design measures been incorporated into the design proposals?
  - If so, please provide details:
  - If not, please justify

## LZC Energy Technologies

Policy 19: Decentralised Energy and Stand-alone Energy Schemes in the *Draft Adur Local Plan* (2012) requires an assessment of the use of low carbon energy, renewable energy and residual heat / cooling for both domestic and non-domestic development proposals.

Principle WH3: Energy in the *Western Harbour Arm Development Brief* (2013) requires all new development to aspire towards achieving zero-carbon status. This will include the use of energy efficiency measures; and the incorporation of low and zero-carbon (LZC) energy technologies and networks.

LZC energy technologies include, but are not limited to the following:

- Solar hot water
- Air source heat pumps
- Ground source heat pump
- Biomass or biodiesel boiler, including:
  - Woodchip
  - Wood pellet
  - Biodiesel

- Biodiesel CHP
- Biomass CHP
- Efficient gas boiler
- Gas Micro CHP
- Solar photovoltaic panels
- Wind turbines

4. Does the development proposal include any low and zero carbon (LZC) energy technologies?
  - If so, please describe, including the size and estimated system capacity.
  - If not, please justify.
5. Is the onsite heating provided through a communal system?
  - If so, please describe.
  - If not, please justify.
6. Does the installed technology supply heat to development off-site?
  - If so, please describe.
  - If not, please justify.

## Materials

Policy 18: Sustainable Design in the *Draft Adur Local Plan* (2012) and Principle WH2: Building Standards in the *Western Harbour Arm Development Brief* (2013) require new residential development to achieve Code for Sustainable Homes level 4 as a minimum. Conversions and non-domestic development are required to achieve BREEAM 'Very Good' Standard as a minimum. This includes the procurement and use of sustainable materials, such as:

- Locally sourced materials
- Timber certified from sustainable sources
- Re-used/recycled materials
- Natural materials

1. Will the development involve the use of sustainable materials?
  - If yes, please describe.
  - If not, please justify.
2. What is the estimated embodied CO<sub>2</sub> (eCO<sub>2</sub>) for the construction of the development?

## Flood risk

Policy 32: Flood Risk and Sustainable Drainage in the *Draft Adur Local Plan (2012)* and Principle WH19: Flood Risk Management in the *Western Harbour Arm Development Brief (2013)* require a site specific flood risk assessment to be submitted for:

- Major developments<sup>2</sup> located in Flood Zone 1
- All development in Flood Zones 2 and 3
- All development or change of use, regardless of flood zone or size, where flood risk from other sources (such as surface water, sewer, groundwater) is identified in the Strategic Flood Risk Assessment.

<sup>2</sup> \*Major development is defined in the Town & Country Planning (Development Management Procedure) (England) Order 2010 as 10 or more dwellinghouses, or sites of 0.5 hectares or more where it is not known if the development will have 10 or more dwellinghouses; the provision of a building or buildings where the floorspace to be created is 1,000m<sup>2</sup> floorspace or more, or development on sites of 1 hectare or more.

The flood risk assessment will need to demonstrate that development:

- Is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed
- Will be safe for its lifetime taking account of the vulnerability of its users
- Will not increase flood risk elsewhere
- Will, where possible, reduce flood risk overall; and will give priority to the use of sustainable drainage systems.

New development must include an appropriate Sustainable Drainage System (SuDS) or other appropriate design measures in order to reduce the risks of surface water flooding and to mitigate the risk of pollution to groundwater sources.

In addition to the requirements above, Principle WH19: Flood Risk Management in the *Western Harbour Arm Development Brief (2013)* requires developers to work with Adur District Council and the Environment Agency to ensure the complete closure of the flood cell between Shoreham Footbridge and the Harbour Mouth through either land raising or flood defences, or a combination of both.

Measures to minimise the risks associated with flooding include, but are not limited to:

- Incorporating internal flood resilience measures into the development
- Providing a safe, dry access route out of flood risk area
- Constructing new flood defences or improving existing defences
- Providing multi-purpose open space for amenity, wildlife, and flood storage uses

- Preparing a flood warning and evacuation plan for the development
- Reducing the built footprint of the site, including hard surfaces.

Proposals will be expected to comply with the Shoreham Harbour Flood Risk Management Technical Guide currently being prepared, once this becomes available.

1. What is the area of the proposed development site within Flood Zone 3?
2. What is the area of the proposed development site within Flood Zone 2?
3. What is the area of the proposed development site within Flood Zone 1?
4. Is any part of the development site identified in the SFRA as being at risk of flooding from other sources (such as surface water, sewer, groundwater)?
  - If so, please give details.
5. Will a site-specific flood risk assessment be submitted as part of the application?
  - If so, please give details.
  - If not, please justify.
6. Will the proposed development provide or contribute to the provision of a comprehensive flood defence solution through either land raising or flood defences, or a combination of both?
  - If so, please give details.
  - If not, please justify.

7. Have measures been incorporated into the layout or design of the development to minimise the risks associated with flooding?
  - If so, please give details.
  - If not, please justify
8. Has a sequential approach been applied to locate the most vulnerable uses in parts of the site with lowest flooding probability?
  - If so, please give details.
  - If not, please justify.
9. Has an appropriate Sustainable Drainage System (SuDS) been incorporated into the development proposal?
  - If so, please give details.
  - If not, please justify.

## Water

Policy 18: Sustainable Design in the *Draft Adur Local Plan (2012)* and Principle WH2: Building Standards in the *Western Harbour Arm Development Brief (2013)* require new residential development to achieve Code for Sustainable Homes level 4 as a minimum. Conversions and non-domestic development are required to achieve BREEAM 'Very Good' Standard as a minimum. This includes the sustainable use of water.

Principle WH4: Water in the *Western Harbour Arm Development Brief (2013)* requires development to aspire towards water neutrality. This includes:

- Meeting high water efficiency standards
- Incorporating facilities to recycle, harvest and conserve water resources

- Incorporating SuDS
- Minimising surface water run-off

This principle also requires development proposals to ensure that there is no deterioration of water quality in the River Adur or groundwater through the use of appropriate SuDS.

1. Does the development proposal meet local policy requirements in terms of water efficiency and quality?
  - If so, please provide details.
  - If not, please justify.
2. Does the development proposal incorporate facilities to recycle, harvest and conserve water resources?
  - If so, please provide details, including what the water will be used for.
  - If not, please justify.
3. Does the development proposal incorporate measures to minimise surface water run-off?
  - If so, please provide details.
  - If not, please justify.

## Public Realm

Policy 14: Quality of the Built Environment and Public Realm in the *Draft Adur Local Plan (2012)* and Principle WH26: Public Realm in the *Western Harbour Arm Development Brief (2013)* require development to improve the quality, accessibility, security and legibility of public streets and spaces in accordance with best practice guidance published by the government, the council and other bodies. Lighting incorporated into developments should provide the minimum for public safety, be energy efficient,

designed to illuminate the target only and avoid light pollution.

Principle WH26: Public Realm in the *Western Harbour Arm Development Brief (2013)* requires the public realm elements of development proposals to be designed in accordance with the *Shoreham Harbour Streetscape Guide (2012)*. This includes technical specifications for:

- Seating
- Benches
- Bins
- Cycle Stands
- Bollards
- Signage
- Lighting
- Guardrails
- Walls and Fences
- Footpath
- Carriageway and Kerbs
- Tree Surrounds
- Vegetation

Principle WH27: Waterfront Character in the *Western Harbour Arm Development Brief (2013)* also requires development proposals to accommodate a high-quality waterfront route.

1. Is provision of on-site outdoor spaces incorporated into the development?
  - If yes please give details, including whether the spaces will be accessible to residents / occupiers only, to the general public or to other groups.

2. Have outdoor spaces been designed in accordance with the Shoreham Harbour Streetscape Guide (2012) and the need to accommodate a waterfront route?
  - If so, please provide details.
  - If not, please justify.
  
3. Are the routes within and/or through the site appropriately lit with low energy lighting?
  - If so, please provide details.
  - If not, please justify.
  
4. Are the routes within and/or through the site accessible by wheelchair users?
  - If so, please provide details.
  - If not, please justify.

## Open Space

Policy 29 in the *Draft Adur Local Plan (2012)* and Principle WH22: Public Open Space in the *Western Harbour Arm Development Brief (2013)* require development to provide open space on site, in accordance with local standards. The type of open space to be provided will be determined by the scale and type of development and the needs of the area.

The Open Space, Sport and Recreation Study set the following local standards:

Type of open space	Hectares (ha) per 1,000 population
Parks and gardens	0.06
Natural and semi-natural green space	1.40
Amenity greenspace	0.81

Provision for children and young people	0.14
Outdoor sports facilities	1.50
Allotments and community gardens	0.30

Principle WH22: Public Open Space in the *Western Harbour Arm Development Brief (2013)* requires three major open spaces to be accommodated across the Western Harbour Arm.

The loss of existing open space will be resisted unless it has become surplus to requirements or would be replaced with equivalent or improved provision in a suitable location.

In the case of any loss of open space, mitigation measures include, but are not limited to:

- Better public access to remaining open space
- Provision of an alternative site
- Significant enhancements to remaining open space

1. Does the proposed development meet local policy requirements in relation to open space?
  - If so, please provide details.
  - If not, please justify.
  
2. Is any open space created as a result of the proposed development?
  - If so, please provide details, including the amount of each type of open space created.
  
3. Is any open space lost as a result of the proposed development?

- If so, please provide details including the amount of each type of open space lost and the proposed mitigation measures

## Greening

Policy 29: Green Infrastructure and Open Space in the *Draft Adur Local Plan (2012)* requires development to incorporate elements of green infrastructure into their overall design. This could include features such as green roofs.

Principle WH20: Ecology and Biodiversity in the *Western Harbour Arm Development Brief (2013)* requires development to include schemes to enhance biodiversity and to minimise surface water run-off. This could include features such as green roofs and walls as well as appropriate planting schemes for the location.

The *Shoreham Harbour Streetscape Guide (2012)* states that all vegetation must be salt tolerant and suitable for a coastal environment. Native species should be used where possible. Trees must be securely staked, hardy and able to withstand strong winds.

1. Does the development include green walls?
  - If so, please provide details including the total wall area covered?
  - If not, please justify.
2. Does the development include green roofs?
  - If so, please provide details including the type of green roof proposed and the total roof area covered?
  - If not, please justify.

3. Does the development include planted areas?
  - If so, please provide details including the total area to be planted and the type of vegetation proposed.
  - If not, please justify.

## Biodiversity

A Biodiversity Survey and Report may be required for any site where removing vegetation (e.g. trees, shrubs, hedgerow or alteration to water courses), or demolishing of older buildings may impact on protected species or have an adverse impact on biodiversity or geological features.

Policy 14: Quality of the Built Environment and Public Realm in the *Draft Adur Local Plan (2012)* requires development to respect the existing natural features of the site, including land form, trees and biodiversity.

Policy 29: Green Infrastructure and Open Space requires development to take account of the ecological characteristics of the area in order to maximise the biodiversity benefits.

Policy 32: Flood Risk and Sustainable Drainage requires SuDS to be designed sensitively and to seek to enhance landscapes, increase biodiversity gains, and provide quality spaces.

Principle WH20: Ecology and Biodiversity in the *Western Harbour Arm Development Brief (2013)* requires all development to aspire to provide net gains to biodiversity, in particular to Biodiversity Action Plan (BAP) species and habitats. All development will ensure that existing biodiversity is conserved protected and enhanced.

Measures to enhance biodiversity include, but are not limited to:

- Incorporating appropriate planting schemes for the

location, including suitable tree species.

- Incorporating features such as green walls and green roofs, with appropriate planting for the location.
- Providing bird nesting boxes.
- Providing bat roosting boxes.
- Providing ponds.
- Providing areas of vegetated shingle.
- Creating or enhancing off-site habitats.

1. Is a Biodiversity Report required?
2. Does the development avoid damage to biodiversity?
  - If so, please provide details.
  - If not, please justify.
3. Are any habitats lost as a result of the proposed development?
  - If so, please justify and provide details.
4. Are any habitats created as a result of the proposed development?
  - If so, please provide details.

## Transport

Policy 27: Transport and Accessibility in the *Draft Adur Local Plan* (2012) requires development to be located and designed to minimise the need for travel and to facilitate and promote the use of alternative sustainable modes of transport.

Development proposals will also be required to contribute towards providing the necessary infrastructure and towards

mitigating the impacts of the development.

A Transport Assessment will be required where the size of development exceeds the thresholds defined for each type of development in WSCC Transport Assessment Methodology and DfT/DCLG Guidance on Transport Assessment (e.g. residential developments over 80 dwellings and over 2,500 square metres for B1 developments).

A Transport Statement will be required above a lower threshold defined in the above documents (e.g. over 50 dwellings and 1,500 square metres for B1 developments).

A Travel Plan will be required for all commercial and residential developments that require a Transport Assessment or Transport Statement.

1. Is a Transport Assessment or Transport Statement required?
2. Will a Travel Plan be written and implemented for the development?
  - If so, please provide details.
  - If not, please justify
3. How far is the development from the nearest bus stops?
4. What is the frequency of bus services from the nearest bus stops?
5. How far is the development from the nearest railway station?

6. What is the frequency of train services from the nearest railway station?
7. Is the route between the development and the nearest bus stops or railway station safe, direct and accessible for pedestrians/mobility impaired/cyclists?
  - If so, please provide details.
  - If not please describe the proposed mitigation measures.

## Pedestrians, cyclists and other users

Policy 27: Transport and Accessibility in the *Draft Adur Local Plan (2012)* encourages proposals to extend the existing cycle network and secure a network of cycle and pedestrian facilities linking urban areas, key sites, open space and the countryside. These will include new and improved rights of way.

Principle WH18: Transport Infrastructure Contributions in the *Western Harbour Arm Development Brief (2013)* requires development to accommodate a new cycle and pedestrian route along the waterfront and to contribute to creating a comprehensive and integrated network for cyclists, pedestrians and public transport.

1. Are the areas around the development designed in such a way that pedestrians and the mobility impaired have good, safe and direct access between the development and local schools, employment, shops, GP surgeries and leisure facilities?
  - If so, please provide details.

- If not, please justify and describe the proposed mitigation measures.
2. Are pedestrians provided with:
    - Appropriate links across the site which follow desire lines.
    - Adequate footway widths for pedestrian flows
    - Raised crossings and / or dropped kerbs on desire lines
    - Ramps
    - Steps and handrails
    - Seating
    - Routes that feel safe (adequate lighting / passive surveillance)
    - Unobstructed routes
    - Development based on pedestrian priority
  3. Are the areas around the development designed in such a way that cyclists have good, safe and direct access to and from the development?
  4. Does the design of the development:
    - Ensure that all vehicle infrastructure is in accordance with Manual for Streets guidance
    - Provide adequate mobility scooter friendly design (including appropriate footway widths)
    - Minimise signing and lining
    - Provide street furniture in line with guidance
    - Ensure all movement infrastructure is maintainable.
  5. Is any guard railing proposed as part of the development proposal?
    - If so, please provide details.

## Parking

Policy 14: Quality of the Built Environment and Public Realm and Policy 27: Transport and Accessibility in the *Draft Adur Local Plan* (2012), and Principle WH17: Promoting Sustainable Transport in the *Western Harbour Arm Development Brief* (2013) require development proposals to include sufficient parking in accordance with *WSCC County Parking Standards and Transport Contributions and Guidance on Car Parking in Residential Development*.

Principle WH17: Promoting Sustainable Transport also states that the he amount of surface and on-street car parking should be minimised wherever possible and innovative solutions to the provision of car and cycle parking are encouraged.

1. Will the development provide for the following forms of parking to current standards?
  - Construction vehicles (while development takes place)
  - Cycle parking
  - Disabled parking
  - Car Club
  - Car Parking
  - Garaging
  - Motorcycle parking
  - Visitor Parking
  - Electric Vehicle Parking and Charging/Generation
  - Servicing
  - Delivery
  - Mobility Scooters
2. Does the development include any on-street or surface car parking?

- If so, please provide details and justify.

## Waste

Policy 28: Delivering Infrastructure in the *Draft Adur Local Plan* (2012) requires development to provide or contribute to the provision of facilities, infrastructure and services made necessary by development, or where it gives rise to a need for additional or improved infrastructure. This includes waste and recycling.

Principle WH8: Waste and Recycling in the *Western Harbour Arm Development Brief* (2013) requires development proposals to incorporate facilities to encourage and enable recycling and to demonstrate that waste is minimised both during construction and the lifetime of the development. This also requires all development proposals to be accompanied by a Site Waste Management Plan.

1. Will a Site Waste Management Plan (SWMP) be submitted with the application?
  - If so, please provide details.
  - If not, please justify.
2. Will facilities be provided to enable and encourage occupants/users of the building to recycle?
  - If so, please provide details.
  - If not, please justify.





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[www.shorehamharbour.com](http://www.shorehamharbour.com)

**Adur District Council  
Civic Centre  
Ham Road  
Shoreham-by-Sea  
West Sussex  
BN43 6PR**

**Brighton & Hove City Council  
Hove Town Hall  
Norton Road  
Hove  
East Sussex  
BN3 4AH**