

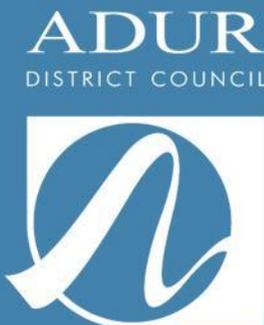


SHOREHAM HARBOUR REGENERATION

South Portslade Industrial Estate and Aldrington Basin Development Brief

Consultation Statement and Summary of Amendments

September 2013



1 Introduction

- 1.01 This statement sets out how Brighton & Hove City Council (BHCC) has involved the community and stakeholders in the preparation of the Development Brief for South Portslade Industrial Estate and Aldrington Basin¹ in accordance with the adopted BHCC 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.
- 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 *South Portslade Industrial Estate and Aldrington Basin Development Brief* (Shoreham Harbour Regeneration / AMUP: 2013)

² *Brighton & Hove Statement of Community Involvement* (BHCC: 2006)

2 Background

2.01 The South Portslade Industrial Estate and Aldrington Basin 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 Brighton & Hove City Council, Adur District 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 South Portslade Industrial Estate and Aldrington Basin (in Brighton & Hove) and the Western Harbour Arm (in Adur). 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 potential displacement of employment floor space
 - 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 Brighton & Hove Planning Committee and Adur 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.
- 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 Shoreham Harbour Regeneration pages on 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 25 related to South Portslade Industrial Estate and Aldrington Basin, 20 related to the Western Harbour Arm, and 6 related to both areas. This included representations from local residents and the following organisations:

- Brighton & Hove City Council (Capital Strategy and Development Planning)
- Brighton & Newhaven Fish Sales
- CityCoast Community Development Group
- Deloitte (on behalf of Cemex)
- East Sussex County Council (Economy, Transport and Environment)
- Environment Agency
- Kingsway and West Hove Residents' Association
- Lambert Smith Hampton (on behalf of Penneys Wharf Limited)
- Natural England

- Prospective Planning (on behalf of Maritime Atlantic Ltd)
- Robinson & Co (on behalf of Hopegar Properties Ltd)
- Southern Water
- The Brighton Society
- Western Esplanade Management Company
- West Sussex County Council

3.24 All representations relating to South Portslade Industrial Estate and Aldrington Basin are included in Appendix 2. A separate Consultation Statement and Summary of Amendments includes all representations relating to the Western Harbour Arm

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

Appendix 1: Summary of Consultation issues, responses and amendments

Comments / Issues	Officer Response	Amendments to the Brief
General Comments		
Comments generally supporting the proposals.	Comments noted.	No change
Concern over financial expenditure on project.	The work is being funded by a central Government grant (Growth Points Programme). Jointly agreed governance procedures are in place to ensure funds are spent appropriately, wisely and in accordance with the grant conditions.	No change
Question over the planning policy status of the Development Brief.	The Development Brief is not a Development Plan Document (DPD) or a Supplementary Planning Document (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 Joint Area Action Plan (JAAP) where key issues raised through the brief process will be tackled in further detail through the further public consultation processes and technical work to follow during 2014/2015. The JAAP will eventually be subject to public examination and DPD procedures. Please note that the brief has been subject to Sustainability Appraisal and the consultation undertaken has exceeded the requirements for an SPD.	Further clarity provided in Introduction.

Comments / Issues	Officer Response	Amendments to the Brief
Concern about the lack of detail in the brief.	The purpose of the brief is to set out a high level illustrative framework and provide a mechanism for consulting and reaching consensus over key issues. Further detail will be provided through the emerging JAAP process and subsequent smaller area projects and proposals.	Further clarity on scope provided in Introduction.
Vision and Objectives		
Concern over whether the vision and objectives are realistic in the current economic climate.	The plans for the harbour are long term during which the economy is likely to fluctuate. The plans need to remain flexible.	No change.
Illustrative Framework		
Concern over the appropriate height of buildings, particularly above the Kingsway level.	Technical modelling of appropriate building heights was undertaken by the consultant team in preparing the Draft Development brief. Following the consultation period and in response to concerns about overshadowing impacts, the recommendations within the briefs were subsequently independently peer reviewed by the BRE. The analysis found that recommendations were appropriate and within the BRE's guidance parameters. The brief wording is clear that proposals must demonstrate high quality design and incorporate sufficient spaces between buildings to accommodate sufficient light through and maximise	Refined text within SPAB27 (Development form) and SPAB29 (Building heights and townscape considerations).

Comments / Issues	Officer Response	Amendments to the Brief
	<p>opportunities for views.</p> <p>In accordance with National Planning Policy (part 6) and Submission City Plan policies CP14 (Housing Density) and CP12 (Urban Design), given the city's physical constraints there is a need to increase density on existing brownfield land in a sustainable manner. The planning authority is obliged to make full and efficient use of sites in order to deliver much needed housing development including affordable housing.</p>	
<p>Questioning as to whether the number of residential units is an over development of the area.</p>	<p>Comments noted. The brief has provided a balance between the need to maximise opportunities for development on previously developed land with local townscape and setting considerations. Technical assessment has been undertaken to peer review the building heights proposed.</p>	<p>Refined text within SPAB27 (Development form) and SPAB29 (Building heights and townscape considerations).</p>
Port / Security		
<p>Concern that the maritime / port character of the area should be strengthened through the briefs.</p>	<p>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. Strategic Objective 2 is to 'Support a growing, thriving Port. Agree that this should be brought out more strongly in the final document.</p>	<p>Addressed in principles: SPAB10 (Proximity of new development to Shoreham Port operations) and new principle SPAB25 (Facilities for boat users).</p>

Comments / Issues	Officer Response	Amendments to the Brief
Concern that safety and security considerations in relation to port uses need to be highlighted.	Agreed – text amended accordingly.	Addressed in principle SPAB10 (Proximity of new development to Shoreham Port operations).
Employment		
Concern as to impacts on existing businesses in the short term.	The brief highlights the important role that South Portslade Industrial Estate, Aldrington Basin and the wider Port currently play in the local economy and promotes a carefully managed approach to the redevelopment of sites. The aim of the brief is to promote a balanced approach to land use which will ultimately improve the business environment. However agree that wording around this issue needs to be refined and strengthened.	Refined wording at 4.1, 4.1.9, 4.2.2 and principles SPAB10 (Proximity of new development to Shoreham Port operations), SPAB12 (Managed release of sites and protection of core employment capacity), SPAB 13 (re-provision of employment floorspace). SPAB14 (Impact on existing business operations), SPAB16 (Improvement of the business environment), SPAB19 (Co-location with employment uses).
The need to highlight the importance of training and skills and harnessing opportunities locally.	Strategic objective 3 (Economy and Employment) includes equipping local communities with training and skills. Through the JAAP process and subsequent rounds of consultation, officers will continue to work with local service providers and further education providers to identify needs and initiatives to harness benefits. Agree wording around this issue needs to be refined and strengthened.	A new principle has been added, SPAB15 (Training and skills).

Comments / Issues	Officer Response	Amendments to the Brief
Residential		
Need to provide greater clarity over affordable housing provision.	Comments noted. SPAB2 requires that new residential developments include a range of tenures and sizes. This is also addressed in the emerging Brighton & Hove City Plan.	Affordable housing is addressed in principle SPAB18 (Affordable housing, tenure, size and unit types).
Transport / Parking		
Need for greater detail in relation to parking provision.	Principle SPAB2: Residential Uses in the Draft Development Brief requires the inclusion of innovative solutions for car and cycle parking. The plans and illustrations are indicative and do not show detailed parking arrangements. The brief requires development proposals to be accompanied by a Sustainability Checklist. This includes the provision of sufficient car parking spaces in accordance with BHCC parking guidance. Local standards for parking provision will be summarised in the emerging Shoreham Harbour Transport Strategy which will form part of the JAAP.	Parking is now addressed in principles SPAB21(Promoting Sustainable Travel) and SPAB25 (Design of Residential Areas).
Need to improve transport infrastructure to accommodate new development.	Principle SPAB17 in the Draft Development Brief includes the requirement for development proposals to contribute towards sustainable transport measures. The Shoreham Harbour Transport Study will inform the consideration of sustainable transport options to adequately mitigate the impact of strategic	Following completion of Transport Study, further detail addressed in principles SPAB21 (Promoting sustainable travel) and SPAB22 (Transport infrastructure contributions).

Comments / Issues	Officer Response	Amendments to the Brief
	<p>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. The Strategy will include improvements to the existing highway network and measures to encourage the use of sustainable modes of transport.</p>	
The need to widen the A259	Whilst development at Shoreham Harbour will require some investment in the local highway network, substantial new road building or widening is not currently part of the spatial strategy.	No change.
A new link road is needed between the A259 and A27	At present neither WSCC nor BHCC intend to build a new access road between the A259 and the A27. Earlier analysis showed that the benefits that could be achieved through a new link road are significantly outweighed by the cost and environmental implications.	No change

Comments / Issues	Officer Response	Amendments to the Brief
Sustainability		
<p>Passivhaus standards should be applied.</p>	<p>The Development Brief and the emerging Brighton & Hove City 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 and uses a 1 to 6 star system to rate the overall sustainability performance of a new home against these 9 categories.</p> <p>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>	<p>No change</p>

Comments / Issues	Officer Response	Amendments to the Brief
Biodiversity		
Include recreational disturbance as an impact on designated sites.	Agreed	This is now addressed in principle SPAB24 (Ecology and Biodiversity).
Infrastructure and Utilities		
Impacts on infrastructure, including water and sewerage, need to be acknowledged.	<p>The brief states that development proposals will be required to make contributions to infrastructure. This includes water distribution and sewerage.</p> <p>Policy CP7 in the emerging Brighton & Hove City Plan requires development to provide or contribute to the provision of facilities, infrastructure and services through S106 Planning Obligations or a future CIL.</p>	Infrastructure delivery and provision of utilities are addressed in principle SPAB9 (Infrastructure and Utilities).
Social Infrastructure		
Impacts on social infrastructure, including schools, youth facilities, community buildings and open space, need to be acknowledged.	<p>The brief states that development proposals will be required to make contributions to social infrastructure. Principle SPAB5 addresses the provision of social infrastructure.</p> <p>Policy CP7 in the emerging Brighton & Hove City Plan requires development to provide or contribute to the provision of facilities, infrastructure and services through S106 Planning Obligations or a future CIL.</p>	Social Infrastructure is now addressed in principle SPAB20 (Contributions to Social Infrastructure). This includes reference to schools, youth facilities and community buildings. Open space is addressed in SPAB26 (Public Open Space).

Comments / Issues	Officer Response	Amendments to the Brief
Leisure / Recreation		
The need to provide and improve marine-related facilities for boat-users such as public hards and slipways to better utilise the river.	Comments noted. Additional detail will be added.	A new principle has been added, SPAB22 (Facilities for boat users).

Appendix 2: Representations received during the public consultation 28 January – 8 March 2013

Rep no: 2001

Consultee: Capital Strategy and Development Planning, Brighton & Hove City Council

OTHER COMMENTS

Reference	Comments
Schools / Planning Obligations	<p>Firstly there is no actual mention of schools anywhere in either development brief. They both refer to educational and cultural services but I firmly believe that the word school needs to be included.</p> <p>Secondly I accept that on the Brighton & Hove side of the proposal it is now only now intended to include for 400 homes which of themselves will not justify the need for any new schools. However coupled with the 1,200 to 1,600 homes on the Adur side this may not be the case. It would be entirely irresponsible to let the development briefs stand without reference to schools and / or S106 contributions in respect of educational facilities.</p>

Rep no: 2002

Consultee: CityCoast Community Development Group

Note: This representation was prepared for consultation on the Emerging Proposals report. CityCoast Community Development Group requested that these comments also be used for this consultation. As such, a number of comments relate to earlier proposals that were not included in the draft Development Brief.)

OTHER COMMENTS

Reference	Comments
Q1. Does Section 2 reflect all the Opportunities and Constraints within the areas of change or is there anything you think we have missed?	<p>The initial Joint Area Action Plan (JAAP) that was published had a number of aims that seem to have been lost as a result possibly of the change in the economic climate. Specifically there is no mention of the stated aim to improve training and Skills in South Portslade We quote “ working in partnership with key stakeholders to improve access and links to training and skills opportunities for local people”</p> <p>It was further stated that an important part of the South Portslade and Fishersgate brief was to “Support improvements to community facilities and services within the area. We think these particular aims should still be reflected in the development brief”.</p> <p>This a chance in a lifetime to make positive change to an area with high deprivation statistics, the people who live there and the needs of the community must be an essential part of any economic and residential regeneration plan.</p>

<p>Q2. Does Section 3 reflect all the issues raised during the first round of stakeholder engagement?</p>	<p>We are answering the questions based on our main geographical area of benefit, which is south Portslade. Regarding the workshop discussion held at the Adur Civic Centre, there was a clear mandate for the developers to include in the brief how the impact of change of use and therefore a growing population would impact on local infrastructure, in particular existing local facilities and any perceived gaps in provision. The CityCoast Centre was highlighted as having real potential to deliver community regeneration outcomes and should have a pivotal role, both within the new estate and surrounding areas including Fishersgate. With a bit of creativity and practical support - e.g. prioritising section 106 agreements - this could be a win-win situation for the developers, the Centre and local residents. We would also question the higher priority given for a bowling alley or cinema rather than a local facility that is providing a range of community support on the ground. Both could be possible if the plan recognised the importance of both.</p>
<p>GENERAL</p>	<p>We would suggest that as part of the consultation that the key stakeholders, council officers and the development team visit the centre to see for themselves the amazing opportunity and potential the Centre has to offer this regeneration process and some of the problems that need to be resolved.</p> <p>What does the Centre currently offer?</p> <p>City Coast Centre is situated in the middle of the industrial estate. It has three floors including a ground floor car park. It is a large building of over 45,000 square feet. It has a large auditorium/theatre seating 500 with a full lighting and sound system, four large multi-purpose rooms and an open plan exhibition / general purpose area and a purpose built preschool. It has a number of offices used by other community groups and charities as a base including the city Coast Trust, RE:GEN Youth project, School-based projects, and Global Compassion (a humanitarian project).</p> <p>The Church and Centre also run community groups and projects, including: a large over 50`s lunch club, counselling, Sunbeams playgroup, The Ark Pre School, youth club and associated activities, 18-30s groups, mentoring, large scale community and family events, age targeted activities, conferences, music and drama and a range of social and advice/support clinics and meetings. On Sundays CityCoast Centre provides the venue for church services for a diverse and multi-cultural congregation of up to 500 people. Throughout the year large-scale community celebrations take place that draw significant numbers from the local community.</p> <p>The wider community are also now using the building in greater numbers, with a footfall of about 1000 people of all ages a week and many other local and vulnerable residents supported through the outreach community and youth work run by CityCoast Trust and RE:GEN Youth Project in Fishersgate. The work in Fishersgate includes work with vulnerable families including some practical support, a lunch club for the elderly, a meeting point for isolated and vulnerable people, in addition to the homework club and free music tuition for targeted young people.</p> <p>Other Community groups using the facilities include, Keep fit, Drama and stage craft, Kumon maths/English tuition. In addition a wide variety of local and national businesses use the facility for training and conferences.</p> <p>A discussion with you on the mutual benefits of seeing how the centre can realise its vision of being a truly relevant and vibrant community centre serving West Hove, Portslade and Fishersgate would be welcomed.</p>

	<p>One area of obvious concern to us would be the issue of traffic and in particular parking. Whilst we have a limited car park of 30 spaces this is not enough to meet demand and how restricted parking impacts on our services as a result of new homes needs to be looked at.</p> <p>Secondly The Centre is currently in an industrial area and noise pollution is not a major issue as most of the businesses are closed at weekend and evenings when the auditorium is in use. The building has a tin roof and we are very concerned that encroaching homes will result in noise problems. This was raised as an issue in the initial consultation with reference to industry and domestic homes being pushed together. As an example can we suggest you look at the problems that the Church of Christ the King in Brighton faced in a parallel situation. We would be looking for BHCC or the developers (through section 106 agreements) to work with us to reduce any noise concerns before residents are moved into the estate.</p>
<p>Q3. Do you agree with the description of the current conditions and defining character of the area or is there anything you think we've missed?</p>	<p>The main description of the estate seems accurate, however, an audit of the number of people currently employed on the estate should be undertaken because the danger is many of the companies may sell up without rebuilding elsewhere and / or if the work moved out of town would the current workforce relocate? What impact would it have on local economics and the already high level of unemployment?</p>
<p>Q4. What are your views on the emerging proposals for this area?</p>	<p>We are in agreement with the proposals in principle and wish to play an active part in developing a sense of community and cohesion both on the new estate and surrounding areas.</p>

OTHER COMMENTS

Reference	Comments
	<p>May we thank you for the opportunity to give our views on the proposed development briefs. Our primary concern is for the Aldrington Basin area and as such the majority of our response is aimed at this area.</p> <p>We operate the fish market at the east end of Aldrington Basin, Portslade and have been on this site for the last 24 years as a tenant of Shoreham Port Authority. We employ 27 staff in the fish market and around 55 fishermen on the boats that land their fish to our company derive their living from us.</p> <p>We have recently signed a new lease with Shoreham Port and are now concerned for the future. We see ourselves as wishing to be operating from this site for the long term and are currently in the process of a major refurbishment costing hundreds of thousands of pounds. This, together with the recent ordering of a new fishing vessel, will need a considerable pay-back period and a period of stability.</p> <p>We see from the report that land to the north of our site is of interest for redevelopment and while we obviously do not have any influence over what happens on privately owned land, any development may have an effect to our existing business and we would like the opportunity to discuss the likely uses of that land. Certain uses of this area may well benefit us, yet there are plenty of neighbouring businesses that could prove far less beneficial.</p> <p>We also read with interest that the overall landscaping of this area is to be looked at so as to improve the access and aesthetics of the area. It goes without saying that we would wholeheartedly support this move but would ask you to keep security in mind as we have to spend a small fortune on security fencing, gates and cameras due to the nefarious habits of some in the area.</p> <p>The “softening” of these areas aesthetic appearance would be in general terms a very good goal, yet security and public safety would be of a concern to us at all times. It should be kept in mind that “opening up spaces for the public”, must lead to easier public access, which in turn may well lead to both security difficulties and safety issues around the working/open quaysides.</p> <p>In general terms, we ask that it is remembered that the Aldrington Basin area is still a working part of the Port of Shoreham, and as such is not conducive in becoming part of a residential marine park.</p> <p>We look forward to being kept fully informed regarding future discussions on this subject and remain at your service at all times.</p>

Rep no: 2004

Consultee: Individual

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

Reference	Comments
4. TREES	This is an important feature. Please be sure to include as many trees as possible, both for air quality, aesthetic, leisure, possibilities. Trees soften a hard area. Grass and lawns are important for people, development and especially growing families.
4. COLOUR	Choose colour that lifts the spirit and remember growing families and development of people's minds through warm colours. Drab colours depress the soul and create drab minds.
4. FEELINGS	Well-being should be the most important factor of design. In fact: good feelings and well-being on the part of the designer create good design. Therefore rational design / bricks, steel, glass etc. follow on as a consequence.

Rep no: 2005

Consultee: Western Esplanade Management Company

OTHER COMMENTS

Reference	Comments
Overview 1.1.2	Shoreham Harbour is an attractive location for industry, business and recreation. An accessible waterfront is part of this. How accessible is the waterfront (we are concerned only with Aldrington Basin)?
Overview 1.2.2	There is also the possibility of housing to help fulfil the city plan. However, except for the area between North Basin Road and Kingsway, Aldrington Basin is not suitable due to flooding and the necessity to preserve industrial development opportunity and office space
Overview	The plan is looking to good design, sustainability, regard for the environment and also provision of enhanced infrastructure. At the same time the marine character must be retained. At present the infrastructure is minimal and poorly placed with narrow roads unsuitable for HGV's, particularly when the plan envisages increased visitor numbers. Retention of the marine character is essential to keeping the present industries, and to attracting visitors.
Vision	Shoreham Harbour to be transformed into a thriving, vibrant waterfront destination This sounds optimistic as far as Aldrington Basin is concerned. Residents are already there and there is little room for more (see PortZed). How many more units are they looking for here? What kind of retail will make it a destination; what kind of leisure? We need far more detail.
Objectives Sustainable Development	Ensuring all new development is sustainable is excellent. We wonder about transport? Renewable energy – do they mean the off-shore wind farm (status?), solar power, Wave power?
Objectives	To provide new employment and better working environment but also to equip local communities with training and

Sustainable Development	skills. Excellent, but how? Scope of businesses to offer apprenticeships? How finance this?
Objectives Sustainable Development	Sustainable and integrated transport. Pedestrian, cycling and public (bus/train) lessen use of private cars. Expensive to provide – estimates of cost and routes?
Objectives Sustainable Development	The development will reduce risk of flooding and coastal defences will accord with relevant shoreline management plan + new Marina to Adur strategy for coastal defences. Detail of these, also status and timing required
Objectives Sustainable Development	Open Spaces, green links and recreation possibilities. Improve access to waterfront and beaches as attractive destinations. How, where? Specifically what do they have in mind for the Lagoon/waterfront/harbour? Will DSAC be affected by anything in the plan? It is a leisure activity, i.e. restaurant, bar and fishing club, but not open to all
Objectives Sustainable Development	High quality streetscapes and design of waterfronts, better access, and protection of historic assets (lighthouse and fort) should include the historic Western Esplanade (houses of architectural interest)
Context – Location (2.1)	At present there are: Promenade and lagoon then an abrupt transition to harbour front. This area benefits from an attractive coastal setting. Very little is attractive at the moment. Only glimpses of the harbour from the lagoon
Adopted / Emerging Policy Guidance	Shoreham harbour identified as having capacity for 400 new homes and 7,500sq m of additional employment space. We believe it is acknowledged that if industrial use of Aldrington Basin is maximised, it will lose the visitor friendly views of harbour/lagoon?
Constraints And Opportunities – Land Use	A259 benefits from dramatic views of the harbour but it is in other ways very poor. Very true – the south side needs attention but in the context, scale and character of the existing/surrounding neighbourhood.
Historic Assets	See interesting history of development of South Portslade
Historic Assets	The present mixture of residential and employment uses echoes the historical development of the area. This is important - the juxtaposition of residential and commercial means that neither are ghettoised and make for a truly lively ambience.
Historic Assets	Though the buildings are not of architectural merit they are robust and add to the character of the area. Building can't all be of Listing quality, but can be worth keeping for many other reasons – lose them and you lose a familiar townscape that has stood test of time and has its own idiosyncratic charm.
Access, Transport And Highways	New junctions at North Street and improving Wharf Road/A259 junction together with possible two-way road from Wharf Road/Basin Road junction to A259 Church Road junction. Interesting. Is there enough space for this? Essential that something is done about the A259/junction with Wharf Road – the whole road set up needs re-thinking; as they

	point out, present roads around the port and Aldrington basin are unpleasant, even dangerous, for walking or cycling due to HGV's, not enough crossing points, poor pavements and poor public realm
Property Market Analysis	Accommodation is varied and dated but vacancy levels are low
Site Topography And Flooding	<p>Flooding: Area between Kingsway and the coast – development here would need to recognise the high risk of flooding.</p> <p>Although the land between the harbour and the sea is raised and thus less likely to flood, it could be cut off from the mainland. Significant flood mitigation is unlikely to be required in this area however <u>new residential development would not be recommended.</u></p> <p>This is the strip of land we are on and its continuation between the harbour and the sea – we agree that new residential development is not acceptable.</p>
Technical Constraints	The assumption is that Aldrington Basin would have more intensive use of land and a wider mix inc. residential. SPA has emphasised that that introduction of residential use be limited and away from the immediate quayside to avoid affecting port operation and nearby employment use. Where exactly do they mean? Confirm only the strip of land between North Basin Road and Kingsway.
Illustrative Framework	<p>Key Interventions:</p> <ul style="list-style-type: none"> • Where will 400 new residential units be? • Improved A259 corridor – YES • Improved connections with Hove seafront & lagoon – YES but needs to be carefully planned. The picture on p155 shows just a general tidying up and opening out, not an increase of Buildings – this looks good. • Improve cycle route/right of way Basin Rd South – at the moment it is dangerous and unpleasant due to traffic fumes and unattractive frontages. <p>The picture on P 32 shows the Caffyn building, but not PortZed on the other side of the road The Picture on p 33 shows much improvement; but only on the understanding that HGV's will not be using the road – they don't mix with small children. Plan on P 36 what has happened to Fish? There doesn't appear to be any retail there?</p>
Land Use	<p>Aldrington Basin</p> <p>Intention to develop under-used sites north of Fish for modern employment space. Yes, but with high quality buildings/retail. That is the part to be opened out to the public to give access to the harbour. Can there not be space for public to walk along this end of the harbour and perhaps round the corner, benches to sit on etc.? A café? Farmer's market? Are they going to develop the small marina?</p> <p>Ferry Wharf: at the moment required to remain in Port use, but if alternative space found this could be released for more intensive and modern employment space. Where is Ferry Wharf?</p>

	<p>Basin Road North: opportunity to develop strip of land between the road and Kingsway. Although other areas of Aldrington Basin will be refurbished and enhanced, no further development or introduction of new uses is proposed.</p> <p>New mix of uses should co-exist with present use and proposed residential areas – this should be carefully designed so that neither interferes with the other. New residential areas should not prejudice the operation of the port.</p>
Residential Development	<p>PortZed: Instead of six blocks all of five storeys above Kingsway, this proposal is for six blocks of varied heights (no turbines) East to West: 3, 4, 5, 5, 4, 3. The lowest will be 11.8m high (the same as the block on the Caffyns site); the tallest will be 17.8m (7.8m higher than the lampposts).</p> <p>Car parking beneath: they propose 32 residential spaces (for 52 flats???) and 35 non-residential which ties in with SPA proposal for more visitor amenities and encouragement to visitors to come. Access??</p> <p>The variation in size is better, but they are still not attractive buildings from our (WEMCO) view from the south. We think they are out of keeping with the buildings on and North of Kingsway, but this is just this specific design – there would be nothing wrong with contemporary design if it fitted its surroundings better (e.g. Pallant House, Chichester extension)*</p> <p>The blocks also still cast too much shadow over the KAWHRA properties – this does not affect WEMCO directly but we strongly support objections made by KAWHRA-owned properties</p> <p>The development will also affect WEMCO; it may be five storeys on Kingsway, but because of the difference in levels between the two roads (Basin Road North and Kingsway) it will be seven stories high on Basin Road North. The Tall Building Strategy should thus be invoked. This area is not a Tall Building Node, and the Port does not provide for it; nor is the south side of Kingsway on a Tall Building Corridor (and area identified to take tall buildings).</p>
Aldrington Basin	<p>Development should be employment-led. The only acceptable space for residential development is between North Basin Road and Kingsway.</p>
Aldrington Basin	<p>New workspace should have a positive relationship with the waterfront – in terms of economic function (see Fish) but also in terms of waterfront access. Sites adjacent to Hove lagoon will be encouraged to have an ancillary retail or visitor function to make the basin more accessible. Given we approve of the retail, visitor function etc; detail is need.</p> <p>What sort of retail? What sort of visitor function? We do not want destination for stag/hen nights.</p> <p>Specifically Basin road South definitely needs enhancing. This suggests retail north of Fish – not mentioned earlier, but obviously a good idea to attract visitor – farmers market, nice café, that sort of thing</p>
Open Spaces	<p>I.e. parks, gardens, playgrounds, allotments, outdoor sports</p> <p>Not much opportunity for more open space this end. Vastly improved routes to the lagoon and beaches are necessary but they must be attractive (present steps through pub terrace or steeply sloping path are neither easy to negotiate or attractive additions to the area. If increased visitors -Transport? Parking?</p> <p>Linkage to the lagoon, and the beaches. Yes, but again, increased traffic? Need much better way to walk there than Basin Road South which is dangerous to pedestrians.</p>

Urban Design	Clear distinction between public, semi-private and private space. Yes, but no gated communities
Building Heights And Townscape	Aldrington Basin. Careful consideration to daylight and sunlight studies re neighbouring areas Townscape around Boundary Road/Kingsway junction should be improved. Special consideration given to west Hove – buildings should complement the existing historic character See PortZed. Also buildings along Kingsway must not block view of the harbour – there should be breaks so openness to the harbour is maintained.
Connections	Hove Lagoon. Yes, as before – it's how will they do it (Access from Kingsway? See above. At the moment through pub or long, steep path, neither satisfactory. What about the cars parked all along Wharf Road?
Connections	Details of proposed new road junction? Any improvement to be welcomed
Energy	District heat and power system – sounds good but how probable is this proposal
Flooding	Aldrington Basin is in Flood zones 3a and 3b. In addition, significant risk from wave over topping.
Noise	Attention to be paid to environmental noise generated by transport, adjacent industrial premises, construction sites and noise in the street. On one side the development authorities are against impacting commercial, which it will if special demands are re noise, pollution etc / at the same time, noise etc must be managed so as not to upset residents. NB only new residents are to be protected from traffic and industrial pollution etc; we should insist that existing residents also should be protected.
Transport Improvements	Traffic calming measures to be installed Improved access to railway stations along the harbour Increased reliability of bus services All the above to be encouraged. Overall – how many visitors to Aldrington Basin are envisaged*? How will they be likely to access the beach? There is the narrow path beside No 1, and then a short walk along the promenade there are steps down. (*Has this been researched?). What if anything, is being done about the present parking area along Wharf Road? Where do they envisage extra car-parking for visitors to be sited (specially if there is increased retail/leisure activity in the area).
General	NB where is the money coming from?

Rep no: 2006**Consultee: 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
	I am very concerned by the sketch illustration (fig 4.4) of Aldrington Basin from Basin Road South. The new development depicted is far too blocky and too high. It will cause severe overshadowing of houses opposite and there are no gaps through for views to the sea.

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

Reference	Comments
SPAB7 Building Heights And Townscape Considerations (5.2.4)	Buildings of four storeys on this stretch of Kingsway will severely overshadow houses to the north throughout the winter. I do not believe any buildings higher than two storeys (above Kingsway level) are appropriate here, as it is a very narrow strip of land, without much space to set back. There should also be a specified maximum height (e.g. 8 metres), as storey heights can be very variable.
SPAB7 Building Heights And Townscape Considerations (5.2.6)	I strongly agree with the statements that the overall scale and mass of proposals should reflect the open maritime brightness of Kingsway and that there should be views through any development to maintain a sense of openness. If you believe that it is unrealistic to deliver generous setbacks along the southern edge of Kingsway, the buildings need to be lower to take this into account – otherwise the overshadowing will be more severe and they will loom over the street, making it lop-sided.

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

Reference	Comments
Sustainability Appraisal	Developments should show that, as well as being sustainable, they do not adversely affect the sustainability of neighbouring homes by blocking their sunlight, reducing their passive solar heating and damaging their ability to generate their own solar energy.

Rep no: 2007**Consultee: Individual**

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? YES	
Reference	Comments
	I think it will improve the whole district and bring new life and opportunities to our area.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? NO	
Reference	Comments
	Not yet – I feel there could be all sorts of new things yet to develop and discuss. Perhaps a wine bar, small restaurants, social club and sports centre.
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
	It all looks very pleasant and modern. Trees and grass – very nice idea in plans shown.
Q5: Do you have any further comments on the Draft Development Brief?	
Reference	Comments
Further Comments	Nice to have some boats and yachts around for people to travel up and down the harbour, unless in the way of boats. Definitely cargo
Further Comments	Wine bars and small shops – Cafes.

Rep no: 2008**Consultee: 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? NO	
OTHER COMMENTS	
Reference	Comments
	Before any development of Shoreham Harbour and Aldrington Basin is considered, a new access road to the area must be provided. Either a bridge across the canal at the bottom of Church Road / Trafalgar Road, or use Basin Road North to link up with Church Road / Trafalgar Road. Basin Road North should be re-routed to skirt the edge of the canal at the Lagoon end of Aldrington Basin, it would be a logical move and would separate HGV's and potential dangers, from the proposed development for leisure. From your pictures it appears that the part of Basin Road South between the Lagoon and new development will be

	<p>virtually pedestrianised as you show nice pictures of people walking and on cycles. Heavy lorries in this same space would be dangerous and would contradict the impression you are making that you want better pedestrian access to the Lagoon from the new development. A shared space for cars and local traffic only from the Wharf Road would enable the houses on Western Esplanade and Hove Deep Sea Anglers to be accessed, also any car parking for people visiting the Lagoon.</p> <p>(Leisure and lorries don't mix.... The lorries have to be moved!)</p> <p>The A259 Wharf Road junction access to the Port has become wholly dangerous and unacceptable for heavy lorries to use, they regularly have difficulties exiting and entering the road, and at times having to swing out so far into the on coming lanes on the A259, stopping traffic from moving. Also over the years there have been numerous shed loads, tyre bursts and jack knifed lorries as they try to negotiate the almost impossible hairpin turn.</p> <p>The Port of Shoreham will be the main beneficiaries from the development so they must pay for a new access road for heavy lorries and industrial traffic as a pre-requisite of any development.</p>
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Rep no: 2009

Consultee: Individual

Q4: What are your views on the Guiding Principles for the Development Brief Area?	
Reference	Comments
<p>SPAB 3: Employment Uses 5.1.14</p>	<p>I'm a local artist who lives and works in the Hove area, I believe it is vitally important that there is some recognition in the development plan for the provision of secure AFFORDABLE workspaces for artists.</p> <p>“Brighton & Hove is a regional cultural ‘city by the sea’ famous for its vibrant, cosmopolitan lifestyle with a strong commitment to the arts and thriving creative industries and digital media sector which attracts tourism and new businesses” Brighton and Hove Draft City Plan Part 1, May 2012. p10</p> <p>Artists, creatives and makers play a vital part in our city’s personality - they are the driving force behind many visual arts festivals, events and independent exhibitions. Most of these are produced on a shoestring budget, at little or no cost to the public purse, and are free to attend. Creative producers make an invaluable contribution to what makes Brighton & Hove a successful city. However, as Brighton & Hove grows, redevelopments in the city have resulted in artists and makers losing their workspaces. Creative producers cannot afford rents at levels commercial businesses and large companies can pay and they are therefore priced out of the market. This does not just affect artists and makers, many other small traders and companies suffer also.</p>

Rep no: 2010**Consultee: Individual**Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? **YES**

Reference	Comments
	The development in this area is long overdue. The coast road between Hove and Shoreham can only benefit from improvements at the moment it looks terrible.
4. Housing	There is a need for more low cost housing and the building of these will enhance the local economy and improve the environment.
8. Recreation and Leisure	There is a need to promote more leisure activities including cycling and walking along the coast road to help improve the health of the local population and visitors to the area. At present cycling along the coast road is very dangerous. Any development that improves the appearance of the coast road should be welcomed.

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

Reference	Comments
	This is an ideal opportunity to provide more local low cost housing, create jobs and improve the environment along the coast road.

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

Reference	Comments
	The coast road should become more accessible to cyclists and attractive to tourists. The proposed development will make this a nicer area in which to live and work.

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

Reference	Comments
	Recycling and waste reduction should be promoted as like cycling and walking rather than car use. The coast road area should have a pleasant environment in which people can live, work or play, at the moment it looks terrible.

Rep no:2011**Consultee: Individual**Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? **YES**

Reference	Comments
	I like the overall goal to keep this as an integrated employment/business/residential area. This emphasis needs to be strengthened

Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? YES/NO/NOT ANSWERED

Reference	Comments
	You may have considered this, but has enough attention been given to providing as fuller range of recreational facilities as possible. For example, provision might be made of a campsite (which might be used by cyclists who increasingly use the coast line as a route), and by others, an environment/ecology centre, and a wind sea sport centre. The port area is a unique habitat, due to its use as a port and its location near a residential area.

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

Reference	Comments
SPAB1	5.1.4 Basin Road North - opportunities exist to redevelop a series of sites in the strip of land between Basin Road North and Kingsway. OK, but these developments should not be large, blocking structures squeezed into the narrow strip.
SPAB2	At Aldrington Basin, residential development will be arranged as apartments. I see no reason why some residential accommodation cannot be part of the industrial/business development, where some owners/business people live on site.
SPAB6	5.2.2 Mixed employment and residential uses with a dual frontage onto Kingsway (residential) and Basin Road North (employment). This is OK, providing that the Kingsway height is not more than 4 stories. I would prefer that there is not buildings on Kingsway, so the view across the port is maintained, but that might be impossible. In any event, there need to be gaps of no buildings to maintain the view, and there needs to be pathways and other welcoming methods of getting from Kingsway down into the port area; so the residential area to the north of Kingsway is still part of the port area.
Building heights and townscape considerations	5.2.3 Proposals for South Portslade Industrial Estate and Aldrington Basin should provide a clear design rationale and justification with detailed reference to the impact and degree of integration within the immediate and wider context established by residential neighbourhoods. Both areas require careful consideration in relation to daylight and sunlight studies. And noise and ecology impact studies.
5.2.4	In general, buildings should be four storeys (apartments). This needs to be all buildings to be no higher than 4 stories.
5.2.6	For Aldrington Basin, particular consideration should be given to the following areas; <ul style="list-style-type: none"> • Southwest Hove: This area is a distinctive neighbourhood and forms an attractive setting to the north of Kingsway. New buildings in the vicinity should not seek to replicate the historic form of southwest Hove. New buildings should be of a modern design which complements the existing historic character. Agree <ul style="list-style-type: none"> • Kingsway streetscene: Proposals for buildings to the north of Basin Road North which rise above the level of the Kingsway will have an impact on the streetscene. The Kingsway currently benefits from an open maritime brightness

	<p>and the overall scale and mass of proposals should reflect this. In this context, it is important that development which addresses Kingsway should be designed to accommodate views through the block to maintain a sense of openness. The scale of development should provide a positive impact on the street environment along Kingsway. It is unrealistic to deliver generous setbacks along the southern edge of Kingsway.</p> <p>Agree. Any developments should also provide for easy pedestrian, and cycle access.</p> <p>I like the idea of the Basin north road be developed along to Church Road so that heavy vehicles can be kept off Kingsway.</p> <p>There needs to be explicit attention given to the development of cycle paths and paths for runners.</p>
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Rep no: 2012

Consultee: Individual

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

Reference	Comments
SPAB6 / SPAB7	<p>With reference to the above and specifically the Section on Building Heights, paragraphs SPAB6 and SPAB7. Four storey (12m) apartment blocks may well be acceptable on the north side of Kingsway, such as the new building just being completed on the old Caffyns site, but this should not automatically be applied to the southern side. Whilst it may be unrealistic to expect generous setbacks along the southern edge of Kingsway, it is certainly not unrealistic to expect a limit in the height of buildings on that side. After all, they have the benefit of two further storeys below road level.</p> <p>In view of the closeness of these proposed buildings to the road and the fact that the road itself is not very wide in this area from the Blue Lagoon pub, I cannot see how anything over two storeys above road level can be contemplated. I was pleased to read that consideration will be given to providing some views through the blocks. I only hope that the same consideration may be given to restricting the height of any construction along the southern edge of Kingsway.</p>

Rep no: 2013

Consultee: Individual

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

Reference	Comments
	I agree with the comments submitted by KAWHRA in all respects

Rep no: 2014

Consultee: Kingsway and West Hove Residents' Association

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? YES/NO/NOT ANSWERED	
Reference	Comments
Vision	The Kingsway and West Hove Residents Association (KAWHRA) agrees with the Vision in paragraph 1.2.1. However in relation to paragraph 1.2.2 we explain in other parts of our representation why we believe that the deliverability of housing at Aldrington Basin needs further consideration.
Objectives	KAWHRA agrees with the objectives in 1.3 (1 to 9).
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? NO	
Reference	Comments
Land use 3.1.3	Local residents consider the close proximity of the much sought-after southwest Hove residential neighbourhood adjoining the northern edge of Aldrington Basin should be mentioned, as well as the Lagoon.
Historic assets 3.2.4	Local residents are pleased to see recognition of the relationship of the character and townscape of West Hove to the area covered by the Brief.
Access Transport and Highways 3.3	The A259 is a well used walking route but suffers from the problems outlined in the Brief. It is unattractive for cycling due to the traffic, although excellent cycling routes into the city are available just to the east of Aldrington Basin.
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
Figure 4.4	Local residents have grave concerns about what this drawing shows. This drawing gives the impression of an unvaried wall of development built along Kingsway. There appears to have been no appraisal of the impact on the Kingsway streetscene. Such a built form wouldn't even comply with some of the Brief's own Guiding Principles for development on Kingsway. The regeneration of Aldrington Basin, new uses on the waterfront, and the return of more and varied ships to regenerated quaysides would provide new interest to tourists and residents alike. People walking or riding in vehicles along the A259 should be able to view across to the much livelier and varied eastern end of the harbour as a feature of the city's waterfront. The scale, bulk and form of development on the south side of Kingsway, as illustrated in this drawing, would be seriously damaging to the Kingsway streetscene, and would overshadow housing to its north (detailed information about our reasons for saying this are contained under SPAB7 below). Therefore this drawing should be removed from the Brief because its presence in this form would encourage

	<p>developers to submit insensitive schemes based on a interpretation of the drawing, and its presence in the Brief would then make it harder for the council to resist them on the grounds of the guidance in the text.</p> <p>We do not think that the rest of the picture is helpful in any case, e.g. boat storage as shown would not happen for practical, economic and safety reasons.</p> <p>Overall therefore the sketch is a very unhelpful picture and should not be included.</p>
<p>Q4: What are your views on the Guiding Principles for the Development Brief Area?</p>	
Reference	Comments
SPAB1 5.1.4	<p>There is wide support from residents of West Hove for maintaining the integrity of Aldrington Basin as an important site for port and employment activity, and for appropriate redevelopment of underused sites north of Fish Sales and possibly Ferry Wharf for employment uses.</p>
	<p>There is also support for the principle of redevelopment of previously developed sites in the strip of land on the north side of Basin Road North.</p> <p>The description of the area is not clear: is it from <i>“the Blue Lagoon Bar to the east”</i> to Woodies restaurant to the west? However, while the principle of redevelopment of land north of this road is supported, there is wide opposition from residents of West Hove to the damaging and inappropriate form proposed in the Brief (see comments under SPAB7 below).</p>
SPAB 2 5.1.5	<p>KAWHRA is concerned at the bald statement at the end of the paragraph that <i>“Wellington Road/Kingsway in particular will benefit from a new residential frontage”</i>.</p> <p>While we would certainly agree that Wellington Road would benefit from softening with good modern housing development, we strongly disagree that the south side of Kingsway would <i>“benefit from new residential frontage”</i>. The change in levels between the south side of Kingsway and Aldrington Basin provides open vistas over the Basin towards the sea and, as in other parts of the harbour, this provides a very effective soft edge (detailed further in our comments under SPAB7). The existing dilapidated boundary fencing provides no justification for erecting buildings. Experience in other parts of the harbour has shown that the greatest improvement at the top of the bank that slopes down to the harbour is simply to replace the fencing with something more attractive, which then frames vistas over the working harbour.</p> <p>Therefore, while there may be other reasons for the Brief to propose development, we believe that it cannot be argued that development on the south side of Kingsway would <i>“contribute to the creation of a softer edge to the Basin employment area”</i> which would <i>“benefit residents and visitors to the area”</i>.</p> <p>Therefore we think that the reference to Kingsway should be deleted from this paragraph.</p>
SPAB2 5.1.6 & 5.1.7	<p>Residential uses on land at Basin Road North:</p> <p>Aldrington Basin is a very different employment area to South Portslade. The Brief recognises that port activities are unsuitable to be in close proximity to housing. Furthermore the Basin is one of the few places in the city that can remain appropriate for employment activities 24/7 in the future, as mixed use development areas increase in other</p>

	<p>employment areas of the city.</p> <p>Therefore KAWHRA is concerned whether the risks of locating housing on the north side of Basin Road North need reappraisal. Housing there would not enjoy a buffer from port uses, as do the houses in Western Esplanade or on the north side of Kingsway. Even along some side roads residents living some distance north of the harbour can hear noises such as goods loading in the harbour. Therefore people living in flats built on land at Basin Road North would be virtually living on top of disturbance by port and business uses.</p> <p>Over future years the wharves on the south side of Basin Road North could conceivably be used for a wide variety of port and employment uses, responding to the vagaries of port and business economics. These could generate a number of issues such as noise, dust, odours, early morning working etc, and we wonder whether siting a number of dwellings on the north side of the road so closely adjacent to the wharves could result in future constraints on such economic activities.</p> <p>Also, the assessment of the possibility of using Basin Road North as an access to the harbour has not yet been completed. Should this come about it would bring heavy goods vehicles, possibly operating early in the morning, close to the south side of housing, which would already have A259 traffic on its north side. (As a location for housing, this island site would then become little more appropriate than the middle of the Vogue Gyrotory!)</p> <p>Again, proposing housing at Basin Road North could preclude this option or lead to pressure for controls on port and business traffic, to the detriment of those activities.</p> <p>By contrast, redeveloping the land north of Basin Road North for employment uses would maintain important flexibilities for the future growth of port and employment activities in Aldrington Basin. This space would help replace some of the employment land used more appropriately for housing development in South Portslade.</p> <p>We suggest that there need to be further discussions about this issue with bodies representing business and port activities, environmental health etc to ensure that the proposed residential use adjoining Basin Road North does not prove to be something of an own goal in terms of maintaining the flexibility for Aldrington Basin to remain as a future resource for growing port and employment activities.</p>
<p>SPAB2 5.1.8</p>	<p>Residents of West Hove agree strongly that a key consideration should be that “<i>Residential development should be of a high quality design with reference to....suitable scale and massing in relation to housing type and local context</i>”.</p> <p>We explain below under SPAB7 below why we consider that in its proposals for the land between Basin Road North and Kingsway the Brief has not had regard to this important Guiding Principle.</p> <p>Although putting forward such site-specific proposals, the Brief neglects to explain why it includes such a proposal, which disregards this Guiding Principle.</p>
<p>SPAB3 5.1.14 – 5.1.16</p>	<p>Employment uses:</p> <p>Local residents support regeneration of underused sites for employment uses, and creation of a more positive relationship between land uses and the waterfront.</p> <p>We believe that improvement of the environment for business will be a catalyst leading to improved business and the</p>

	<p>attraction of new business.</p> <p>Likewise local residents are very supportive of creating an interrelationship between Hove Lagoon, the seafront esplanade and Aldrington Basin.</p> <p>However residents have concerns about the possible conflict of residential use on the northern edge of Aldrington Basin, which are detailed in comments on 5.1.6 & 5.1.7 above and SPAB7 below.</p>
<p>SPAB4 5.1.17 – 5.1.18 And also Fig 5.2</p>	<p>Retail uses:</p> <p>West Hove residents strongly support the possibility of appropriate ancillary retail uses in the regeneration of the Basin area north of Fish Sales. This could help to better integrate Aldrington Basin with the Lagoon and seafront areas.</p> <p>However, Figure 5.2 appears to indicate retail use at ground floor level on Kingsway, although there is no reference to it in the relevant part of the Brief (in 5.1.18).</p> <p>We do not see any justification for retail or further food and drink uses in this largely residential part of Kingsway. Such uses could be unneighbourly to the houses opposite. They would be likely also to generate traffic and parking in residential side streets.</p> <p>Such uses would not meet any identified local need, and experience of the area suggests they may well be marginally economic. Indeed the focus of attention needs to be on maintaining the retail vitality and viability of nearby Boundary Road/Station Road, not diverting business from it.</p> <p>Therefore, apart from the existing shop, bar and restaurant, such uses in any further buildings which have a frontage on the south side of Kingsway would be unneighbourly and a waste of space better used for offices or housing.</p>
<p>SPAB5 5.1.25</p>	<p>Social Infrastructure:</p> <p>Local residents consider that education should be the priority for funding because of a severe shortage of school places in this area.</p>
<p>SPAB6 5.2.2</p>	<p>Development form:</p> <p>KAWHRA agrees with the idea of two or three storey development for employment uses on vacant/underused plots in Aldrington Basin, and considers that it is important to recognise this as an important context for development north of Basin Road North.</p> <p>We have explained above under SPAB2 why we believe that the idea of residential use on the upper levels of land at Basin Road North needs reappraisal in relation to compatibility with port and employment uses and the possible harbour traffic rerouting along Basin Road North.</p>
<p>SPAB7 Figure 5.2, 5.2.2 – 5.2.4 in association with 5.1.10 & 5.1.14</p>	<p>BUILDING HEIGHTS AND TOWNSCAPE CONSIDERATIONS:</p> <p>KAWHRA objects strongly to the clear indication throughout the Brief for two storey development on land at Basin Road North rising to a further three / four storeys above the south side of Kingsway on the grounds of:</p> <ul style="list-style-type: none"> I) The inappropriate townscape impact in both the immediate and wider context. II) The lengthy overshadowing of homes on the north side of Kingsway during the winter. <p>TOWNSCAPE:</p>

Local residents see Kingsway alongside Aldrington Basin as an integral part of the A259 coastal route, as well as a key road in their neighbourhood. KAWHRA considers that the proposal for the building height of development on land between Basin Road North and Kingsway shows no regard for its local or wider context.

Although the Brief says that proposals for Aldrington Basin should “*provide a clear design rationale and justification with detailed reference to the impact and degree of integration within the immediate and wider context established by residential neighbourhoods*”, this Brief fails to do so in relation to its own very specific proposals for this sensitive area.

The broader context

Between King Alfred and the industrial area adjacent to Shoreham Lighthouse, there is no development on the south side of the A259 of the height, bulk and extent proposed in this part of the Brief. The A259 is characterised by interesting open vistas over the seafront open spaces and the working harbour.

Such development as exists in short lengths on the road frontage is lower and less bulky.

No other significant change to this is planned for the south side of this part of the A259. Therefore in the broad context the Brief's proposals would stand out like a sore thumb, in isolation in terms both of its height and of the extent of built up frontage.

Elsewhere in the harbour the emphasis has been on improving the look of the harbourfront. Walling off the harbour in this one location cannot be justified.

The local context

The West Hove neighbourhood was designed with just a tight group of buildings provided on both sides of Kingsway at the neighbourhood parade (shops, pub and Caffyns garage), but then open vistas remained over the Basin apart from a filling station (now converted into the pet shop), and a commercial building (now Woodies).

As we commented above, on 5.1.5, there are better ways of improving the street's appearance than by building.

Development is sporadic, but that is no justification for filling in the gaps

The extensive neighbourhood north of the strip of land identified for redevelopment between Basin Road North and Kingsway comprises mainly two-storey houses with deep pitched roofs. In recent years two former workshop sites in the neighbourhood service area on the north side have been redeveloped for four-storey flats, but there are no further redevelopment opportunities in the vicinity. Therefore the majority of the redevelopment area at Basin Road North lies to the south of predominantly two-storey housing.

Erecting a line of four-storey buildings on the south side of Kingsway would therefore create an unbalanced streetscene. This would be exacerbated by the sharp change of levels down to the much lower scale of two/three storey redevelopment now proposed in Aldrington Basin.

Not only would the scale of development look wrong from Kingsway, but also from within Aldrington Basin. Buildings on the north side of Basin Road North would be six storeys high, much higher than anything existing or planned on the south side of that road, or elsewhere in the Basin.

Therefore the indicated height for development on this long, narrow strip of land would be unrelated to the north-south

	<p>fall in the grain of the land, the overall height of existing buildings in West Hove, and the height of development planned in Aldrington Basin.</p> <p>Whether viewed from West Hove or Aldrington Basin such buildings would appear twice the height of their respective surroundings.</p>
	<p><u>Changes to the Submission Draft City Plan in January 2013:</u></p> <p>These have confirmed that Kingsway west of Wish Road is no longer regarded as appropriate for taller buildings – the Brief needs to be updated accordingly.</p> <p>This is a new factor to be taken into consideration of local townscape issues.</p>
	<p>THE STREET ENVIRONMENT ON KINGSWAY</p> <p><u>Setback of the building line:</u></p> <p>The buildings indicated at the back edge of the narrow southern footway would feel oppressive to pedestrians. Figure 5.2 indicates building up to the back edge of Kingsway’s southern footway, and paragraph 5.2.6 refutes the idea of a significant setback. However this is unexplained.</p> <p>All buildings on both sides of the road are set back to a greater or lesser extent (e.g. the Vega flats under construction on the former Caffyns site on the north side, or the Blue Lagoon Bar and Britannia House on the south side).</p> <p>Therefore we consider that the Brief should indicate the need for at least a modest setback on the south side to the building line of the Bar and Britannia House, whatever the height of buildings proposed.</p>
	<p><u>Maintenance of the light and sunny character of the street:</u></p> <p>From King Alfred to Shoreham, the A259 is largely light and sunny, with only sporadic development close to the back edge of the footway briefly overshadowing it (e.g. the Blue Lagoon Bar building).</p> <p>However when you get to the area in Shoreham where the warehouses are right up to the footway for a considerable distance, then that whole side of the road looks gloomy and unattractive as a place to walk. This is bad enough in an industrial area, but seriously damaging to the environment of our residential neighbourhood.</p> <p>The south side footway of Kingsway alongside Aldrington Basin is already well used by pedestrians, and we consider that it is essential to maintain and improve its attraction as a light and sunny walking route at all times of year. This means maintaining regular open gaps at Kingsway level between any buildings between the Blue Lagoon Bar and Woodies restaurant.</p>
	<p>OVERSHADOWING OF EXISTING HOUSES:</p> <p>Development at Basin Road North that rose to three and four storeys above the south side of Kingsway would damagingly overshadow the two-storey homes on the north side of this narrow part of Kingsway for an extensive period in winter.</p> <p>In view of the sensitive interrelationship between building height and overshadowing, local residents’ experience has been that building heights should be specified primarily in metres, because ‘storey’ heights can be extremely variable in different planning applications.</p>

	<p>The extent and duration of overshadowing by development on this constrained site, which lies south of existing homes, is easily predictable mathematically. It is also observable on the ground by photographing the winter shadows cast on the front of Kingsway houses by the 10m high lamp posts situated on the road's southern footway. These shadows extend up the entire frontage of these houses, up to roof level.</p> <p>Our research shows that homes on the north side of Kingsway would be overshadowed in winter by 9m (3 storeys) developments for at least 8 weeks, by 12m (4 storeys) developments for at least 12 weeks, and 15m (5 storeys) developments for at least 16 weeks.</p> <p>The fronts of these existing homes all face south. The south-facing rooms currently enjoy high levels of daylight and sunlight at all times of year. In winter residents enjoy noticeably much higher levels of natural light and warmth in south-facing rooms, compared with those rooms on the north side of their homes.</p> <p>Overshadowing therefore would adversely affect the quality of life currently enjoyed in these houses and flats, necessitate increased use of artificial light and heat, and increase people's risk of suffering the SAD disorder.</p> <p>Furthermore a number of houses, and the BP Filling Station, have already fitted photovoltaic energy cells at various levels on the south facing elevations of houses and on top of the filling station canopy. All properties along the north side of Kingsway are in the best position to benefit from fitting further PVs in the future. PVs are productive in winter, but shadows would seriously affect their productivity.</p> <p>Paragraph 5.2.3 of the Brief states that overall in South Portslade and Aldrington Basin "<i>Both areas require careful consideration in relation to daylight and sunlight studies</i>", presumably at the planning application stage.</p> <p>However there is no need for further studies to show the serious adverse overshadowing of the row of existing homes, located along the north side of Kingsway, by development on the Basin Road North development site that extended to the height above Kingsway proposed in the Brief.</p> <p>If the Brief is not amended the council would be hard placed in future to refuse a planning application on overshadowing grounds, if they have stated a building height on this site in the Brief which they demonstrably could have known would overshadow.</p> <p>The fact that structures over 6m in height (2 storeys) will damagingly overshadow homes to the north has to be recognised in making any decision about storey heights on the Basin Road North sites in this Brief.</p> <p>Therefore the Brief cannot remain equivocal. The height of development shown in the Brief should be amended to safeguard residents' quality of life in their homes and their ability to make use of the high levels of passive solar light and warmth enjoyed in winter.</p> <p>If the Brief is not amended, residents will expect an unequivocal explanation of the reason for encouraging such damaging development on this site, for example if more weight is given to new housing gain than to protection of the amenities of existing houses.</p>
<p>SPAB9 5.3.1</p>	<p>Sustainability: In view of the existing air quality issues in the A259 area we suggest that the list should also include particulate</p>

emissions because of the possible use of wood burners as an alternative power source.

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

Reference	Comments
	<p>CONCLUSIONS</p> <p>Residents in West Hove welcome the Brief process, which has resulted in the long overdue recognition that Aldrington Basin is both an important part of Shoreham Harbour and of the city's land for employment uses, and that housing and port/employment uses within the Basin are mutually incompatible. The overall vision for regeneration of the Basin therefore is now considered to be realistic and appropriate.</p> <p>The abandonment of past ideas of mixed use housing and business development in tall buildings hopefully will now create a clear way forward for investment in the Basin for much needed modest scale modern space for harbour and business uses.</p> <p>Hopefully a way will be found to implement the Brief's imaginative ideas for creating a better relationship between the eastern end of the Basin and the Lagoon and seafront area.</p> <p>However the exceptions to the otherwise well balanced vision and proposals for Aldrington Basin are the ideas, outlined in some detail, for the redevelopment of the narrow strip of land on the north side of Basin Road North. Redevelopment of this land is welcomed, but the scale proposed is strongly opposed by local residents for being both entirely inappropriate in its surrounding context and damaging to residential amenity.</p> <p>In terms of townscape and streetscape the height, scale and extent of development proposed on this long, narrow strip of land would appear isolated, damaging and out of context with the entire south side of the A259 road between the King Alfred and Shoreham, and locally with the overall adjoining residential neighbourhood.</p> <p>Development of the height proposed would seriously overshadow more than 20 houses and flats immediately to the north of this strip of land in winter. It can be demonstrated, by observation and by calculation, that buildings on this site extending above the Kingsway frontage higher than 6 metres (2 storeys) would overshadow the front elevations of homes on the north side of Kingsway for a long period in winter, seriously damaging living conditions in these homes and necessitating increased future use of artificial heating and lighting.</p> <p>The Brief's envisaged four storey (12 metres) high buildings would overshadow these adjoining homes for more than 12 weeks in winter, and even reducing them to three storeys (9 metres) would overshadow them for 8 weeks. However there is no recognition of this in the Brief, or any explanation of the reason for proposing such damaging development.</p> <p>These proposals are for a damaging and inappropriate form of development which could not even pass the tests of some of the guiding principles set out in the Brief itself.</p> <p>We have concerns that the Brief seems to be driven by a residual need to identify some housing at Aldrington Basin even though the only option available is to hoist housing above the floodplain in Basin Road North to front onto Kingsway. The Brief's indication of four storey (12+ metres high) apartment blocks demonstrably would be damaging</p>

	<p>and inappropriate. Therefore, unless the amenities of local residents and the Kingsway streetscene are to be seriously compromised to augment the city's housing supply, the Brief must be amended.</p>
	<p><u>KAWHRA's suggested changes</u> <u>Integration into the townscape</u> Revised guidance needs to be based on a vision of creating a gentle transition between the existing levels of development to the north, and the proposed levels to the south, together with retention of an open texture along the Kingsway frontage. This would ensure that Kingsway remained a light and sunny route, with opportunities for passers-by to look into Aldrington Basin. Also, living conditions in existing homes would be protected.</p> <p><u>Land uses</u> It is not clear why housing in the Basin based on the narrow strip of land on the north side of Basin Road North would be any more compatible with port/employment uses than on other land in the Basin. This needs further consideration, and the best solution could well be to redevelop the Basin Road North sites for modern employment space, on the same two/three storey scale as the rest of the Basin. This would augment the employment land supply that will be affected by the losses planned for building housing in the better location of South Portslade. This would leave Kingsway as an effective buffer zone between port and employment uses and the nearest housing. <u>However, if housing development of land in Basin Road North is envisaged for housing fronting onto Kingsway, these are our suggested guidelines:</u></p> <ol style="list-style-type: none"> 1. Re-development should be designed only when a decision has been taken on whether to upgrade Basin Road North, in order not to prejudice the best alignment to best serve the overall functioning of Aldrington Basin for HGVs, other vehicles, cyclists and pedestrians. 2. Developments for small premises for employment uses should be encouraged fronting Basin Road North. The possibility of combining these with residential development above them as Live-Work units should be investigated. 3. It would be appropriate to develop buildings along the total frontage of land at Basin Road North level. 4. However buildings or parts of buildings appearing above the level of Kingsway should be spaced apart from each other to break up frontage development along Kingsway. Buildings should not adjoin existing development or occupy more than 50% of the currently undeveloped frontage in order to retain Kingsway's overall light and open texture, and views into the Basin by passers-by from the A259. 5. Buildings or parts of buildings should not be higher than 6 metres (two storeys) above Kingsway. This would produce a balanced street scene along the A259 and a gentle transition in scale between West Hove and Aldrington Basin.

	<ol style="list-style-type: none"> 6. In views from Aldrington Basin level, such overall three/four storey structures would fit into the regenerated Basin's townscape. 7. Also, and importantly, this height of development would avoid damaging overshadowing in winter of existing homes on Kingsway which lie north of the development. 8. Buildings should have a modest setback from the edge of the footway, at least on the lines of the Blue Lagoon Bar and Britannia House, in order to provide a softer edge to the public path, and privacy to the ground floor of the buildings. 9. The two storeys at Kingsway level (i.e. the third and fourth storeys above Basin Road North) should be in residential use only, with no further retail/food uses introduced into the Kingsway frontage. Also, consideration could be given to using the second storey above Basin Road North for residential use by linking it with the third storey in the form of maisonette units.
	<p>To conclude: Residents in West Hove want to see successful regeneration of Aldrington Basin carried out in a way which fits well into the townscape and which safeguards the amenities enjoyed in the adjoining residential neighbourhood. We believe that our ideas could achieve such a win-win situation. We would be very happy to arrange a meeting to discuss any of the issues raised in this representation with officers or Members.</p> <p>Note about KAWHRA: The Kingsway and West Hove Residents Association represents residents living in the area between Kingsway, Boundary Road, New Church Road and Roman Road. Over the past two years residents have considered issues in depth related to development on Kingsway and the future of Aldrington Basin by a variety of methods including public and workshop meetings, a website and regular emails to over 100 households. This representation, prepared by KAWHRA's committee, therefore is a consensus of the opinions shared by the majority of local residents in the neighbourhood adjoining Aldrington Basin.</p>

Rep no: 2015

Consultee: Prospective Planning (on behalf of Maritime Atlantic Ltd)

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? YES	
Reference	Comments
	<p>The objective of the development brief to facilitate the implementation of the adopted Port Master Plan is welcomed. The acknowledgement that the Aldrington Basin presents an opportunity to deliver new residential dwellings to assist the housing targets as set out in the city plan is also welcomed.</p>
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? NO	

Reference	Comments
3.3.1	Highways – improvements to Basin Road North as discussed should be emphasised as this will facilitate the redevelopment of sites in this part of Aldrington Basin. In addition the improvements will improve access and transport links to the rest of the harbour and the area generally.
3.4.1	The fact that the background work which has already been undertaken shows that residential use is likely to be a key value driver in this area should be emphasised.
Fig 3.4	This figure emphasises that the Aldrington Basin Development Brief Area is not affected by any technical constraints other than the AQMA.
3.7.2	It is suggested that a constraint on development is avoiding prejudicing port operations. This constraint has been driven by the Shoreham Port Authority. However opportunities in The Aldrington Basin do exist for the introduction of land intensification on a wider mix of uses, including wholly residential uses, on sites with a frontage on the immediate quay side. These could be developed without prejudicing port operations or adjacent employment uses. This would tie in with the allocation on the port master plan, which was prepared by the Shoreham Port Authority in conjunction with Brighton & Hove City Council, that identified part of The Aldrington Basin as a development opportunity. The emerging city plan allocates Aldrington Basin as part of an area of change to provide 400 new housing units. The development brief should acknowledge this as an opportunity for the area to meet the aims and objectives of the emerging city plan.

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

Reference	Comments
Fig 4.2	The illustrative framework indicates numbers on the proposed development sites. It is assumed that these refer to phasing proposals but this is not referred to in the accompanying text.
4.1.2	The key proposals are summarised to include the delivery of approx. 400 new residential units. The sites which have been identified will not be capable of delivering this target on their own. Therefore it is suggested that either further sites be identified or the illustrative framework is revised to not indicate individual sites for redevelopment. This could be left to development management procedures and considerations rather than being included in a prescriptive development brief document.

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

Reference	Comments
SPAB1	Para 5.1.4 Basin Road North – The draft development brief suggests that opportunities exist to redevelop sites in the strip of land between Basin Road North and Kingsway. Planning applications have been submitted for some of these sites but these have been proved controversial due to their impact on the residential area to the north of Kingsway and in particular and the wider harbour area in general. It is suggested that opportunities equally exist for redevelopment of the land between Basin Road North and the basin itself. This could achieve a similar level of development but with less detrimental impact on the surrounding amenities.

	The possibilities outlined above should be referred to in the “other sites” paragraph in this section of the brief. In this regard the paragraph should recognise that redevelopment or the introduction of new uses would be considered. Paragraphs 5.1.6 and 5.1.7 of SPAB 2 recognises that a key consideration is a new mix of uses including residential and employment can coexist.
SPAB2	Para 5.1.7 Suggests that port land and port activities are unsuitable to be in close proximity to housing. However the illustrative framework appears to suggest that in the case of development sites identified in that framework adjacent to Basin Road and the Hove Lagoon, this relationship would be acceptable. In Aldrington Basin the sites adjacent to Basin Road North could be redeveloped so as to enhance the general amenity and in the context of SPAB 2 would not be any closer to port activities than the sites already identified in the brief.
SPAB3	Para 5.1.14 The NPPF contains policies which encourage mixed use developments either by way of conversions or new buildings. The approach taken by the development brief by restricting residential development to the “Northern edge of The Basin at an upper level “is not in accordance with the NPPF policies. This paragraph should be encouraging the more efficient and sustainable use of the land throughout the Aldrington Basin development brief area through mixed use developments. These can be employment lead and should protect the employment base of the city. This approach would assist in achieving the city plan housing target plans and trajectory and help to achieve a more positive relationship with the water front.
SPAB6 / SPAB 7	The development form suggested for Aldrington Basin should be revised to take account of the representations made earlier in this consultation. In particular the references to mixed employment and residential uses should not only refer to the dual frontage of Kingsway and Basin Road North. The development brief should be expanded to take account of other development opportunities by offering a more general development form guidance. This consideration should take more account of the possibility of development on sites which have not been specifically identified in the development brief so far.
SPAB8	Para 5.2.9 It is an aim of the development brief to improve the link between Aldrington Basin and Hove Lagoon. This could be achieved by further development of sites in the vicinity of the boundary between the 2 areas and achieve the aim of softening the current boundary. This would include sites between Basin Road North and the basin itself. The inclusion of further sites as potential development opportunities would lead to enhanced infrastructure contributions and likely fast track timetable for the provision of public realm improvements to achieve this aim.

Rep no: 2016

Consultee: The Brighton Society

OTHER COMMENTS	
Reference	Comments
1.	Introduction

	<p>In principle we welcome the publication of the Shoreham Harbour Development Briefs and are generally in favour of the proposals for the improvement of the Western Harbour Arm, in particular the opening up of the waterfront area and introduction of residential and mixed uses along the northern side of the harbour.</p> <p>Our main comments relate to the proposals for the Portslade and Aldrington Basin Development Briefs. We understand that because of the proposals for the Western Harbour Arm, that the eastern end of the harbour will become more of a focus for the commercial and industrial aspects of the Port's operations.</p> <p>But we have two major concerns about the Brief as it stands at present:</p> <ul style="list-style-type: none"> i. The peninsula served by Basin Road South is not included in the Development Brief, with the result that important issues of public access and amenity along that lengthy stretch of beachfront are completely ignored. ii. The relationships between Hove Lagoon and the western end of the harbour, although mentioned in the Development Brief, have not been adequately carried through into the proposals, and the potential for improvements to the northern side of Aldrington Basin has not been adequately explored. <p>In specific terms we would make the following comments and observations:</p>
	<p>2. Scope of the Development Briefs</p> <p>We would like to see the areas covered by the Development Briefs extended to include all the land operated by the Shoreham Port Authority. The whole of the peninsula served by Basin Road South, including the public shoreline does not form part the area included within the scope of the Planning Brief. We believe it should do, as these areas are important to the public interest in terms of access, visual amenity and recreational value.</p> <p>These factors could well have an effect on decisions about the future land uses adjacent to the beachfront and the harbour waterfront, and this should be recognised as an essential part of a development brief for Shoreham Harbour.</p> <p>See para 3.3 below for further discussion on this point.</p>
	<p>3. Aldrington Basin</p> <p>3.1 Link to Hove Lagoon</p> <p>Para 3.2.4 states that Aldrington Basin has “an important link with West Hove.....which is significant in relation to townscape considerations and historic character”. This is supplemented by para 5.2.8 (Urban design) which states that “there is a major opportunity to augment proposals for improved employment, leisure and retail uses through the delivery of new signage and improved visual and physical access from Aldrington Basin to Hove Lagoon”</p> <p>But we are concerned that these aspirations – which we would strongly support – are not adequately carried through in the proposals – and may in fact be contradicted by them.</p> <p>We agree that there is an important relationship to Hove Lagoon to the east, and it seems to us that there is an excellent opportunity for Aldrington Basin to form a natural westward extension of the Hove Lagoon area both in physical and visual terms. This is to some extent recognised in the Development Brief (para 4.1.2 item 6 and the sketch shown in Fig 4.4), but the idea is not adequately followed through or detailed any further in the Brief. In fact,</p>

	<p>most of the small area concerned is shown on Fig. 5.1 of the Development Brief to be occupied by employment uses, whereas we think it would be better if it was opened up as a public open space with views both towards Hove Lagoon to the east and the harbour to the west. See Figs 1 and 2 below.</p> <p>Para 4.1.2 of the Brief Items 6 – 8 propose “Improved connections with Hove seafront and lagoon through landscape and wayfinding.. An appropriate approach to scale and massing... Improve the cycle route / public right of way which follows Basin Road South (national Cycle Rute 2 / Monarch’s Way)”. But the plans and proposals shown in the Brief do not reflect any of this. We think they should.</p> <p>The potential link between the two areas is currently obscured by the boundary hedge to the Lagoon area and a scaffolder’s yard between that and the western end of the harbour. (See Fig 1 above). This narrow strip of land could easily be opened up in the future to allow the western end of the harbour to become a transitional area between the recreational use of Hove Lagoon and the more commercial uses associated with Aldrington Basin, and to form both a visual and functional link between the two.</p>
	<p>3.2 Possible effect on the Brief for Aldrington Basin</p> <p>If this concept was included in the Aldrington Basin Planning Brief, it could mean that the balance of uses between the Western Harbour Area and Aldrington Basin could change in order to allow the recreational uses and pedestrian and cycle links to be extended from the Lagoon public open space into the Harbour area, in much the same way as is proposed for the new development areas in the Western Harbour Arm.</p> <p>It would seem more logical to locate some of the industrial and commercial uses currently shown in the Development Brief for the Aldrington Basin further west in the harbour, and closer to the heavy industrial uses associated with the oil depots, power station and minerals storage areas. This would then release more land in the Aldrington Basin area for the sort of residential and waterfront recreational uses proposed for the Western Harbour Arm. The small scale of the harbour at the western end of Aldrington Basin and the potential links to the Hove Lagoon area would seem to be ideally suited to that.</p> <p>We strongly question the statement in para 3.7.2 of the Brief that “Shoreham Port Authority has recently emphasised that the introduction of residential uses into Aldrington Basin should be limited away from the actual quayside to avoid prejudicing Port operation and adjacent employment uses”.</p> <p>Why is it possible to propose residential uses on the north side of the Western Harbour Arm (areas which are close to the Harbour entrance), and yet not to do the same at a point of the Harbour furthest away from the Harbour entrance? It seems to make little sense.</p>
	<p>3.3 Improvements to Basin Road South and the beachfront</p> <p>It could also mean that the currently appallingly unfriendly and unsightly pedestrian and cycle route behind the Esplanade housing to the western end of Basin Road South, could be vastly improved to allow both better views of the harbour to the north and the beach to the south, and increase the recreational value of whole of the seafront</p>

	<p>between Hove Lagoon and Carat's café at the western end of Basin Road South.</p> <p>In combination with much needed improvements to the interface between Basin Road south and the beachfront, this could effectively extend the public realm of Brighton and Hove seafront much further to the west, which, by incorporating links across the harbour like the existing pedestrian and cycle bridge, would in turn benefit the occupants of the new housing developments proposed along the northern edge of the harbour by providing better access to the beachfront. Para 5.1.23 of the Brief states "Linkages to existing open space assets such as Hove Lagoon, West Hove and Portslade / Southwick Beaches will also be encouraged".</p> <p>We cannot find any evidence elsewhere in the proposals which shows how this will be achieved and accordingly conclude that it is not a serious policy aim. It should be.</p> <p>The potentially attractive views and access to the beachfront from Basin Road South are concealed behind a high concrete wall or separated from it by high and unsightly metal fencing for much of the length of the roadway.</p> <p>The whole area is scruffy and unkempt, with no attempt at any landscaping or softening of the industrial character of the area. It is also very unfriendly towards pedestrians and cyclists. Para 3.3.1 of the Brief admits that "<i>the A259 is an unattractive environment for walking and cycling due topoor public realm and pavement conditions</i>". This applies also to Basin Road South but here it would be possible to make a great improvement to public access and the public environment.</p> <p>We strongly believe that improvements to Basin Road South should be included in the Development Brief – the Shoreham harbour area includes a lengthy stretch of seafront, and it is very much in the public interest that improvement of this area should form part of any development brief to provide better access to the beach, better facilities and landscaping, and improved views of the coastline from the Basin Road South area. This could be done without in any way compromising the essentially industrial uses within the Port Authority area.</p>
	<p>Northern side of Aldrington Basin</p> <p>The Development Brief lists four aims for land use around Aldrington Basin (Para 5.1.4) but they are very specific and do not consider the long term potential for developing the northern side for residential and recreational use. We note that the Port Authority has concerns with residential quayside developments but the Development Brief should be considering long term potential for this valuable stretch of the harbour.</p> <p>Currently most of the heavy industry is concentrated on the southern side of the basin where there is good road access. The northern side has poor access with only narrow roads and restricted parking. There are three major users, the Texaco fuel depot, Travis Perkins Builders merchants and the Cemex ready mixed concrete depot. Travis Perkins and Cemex are concentrated in one area at Britannia Wharf and the Texaco depot is located at an isolated location at the far end of the developed northern side. The remaining areas along the northern side have industrial units of varying size and condition interspersed by small marinas. Many of the industrial units are located on the quayside but do not use any form of shipping or any harbour facilities. Some of these industrial areas have car parks along the quay with access to the water cut off by wire fencing. See Figs 8 and 9 below.</p>

	<p>Even the small marinas cannot be accessed as they again have high security fencing. (Fig 10). This side of the harbour would be ideal for residential and public access along the harbour side but currently most of the quayside is lined by barbed wire fencing. This area could provide high value residential developments and could provide spectacular quayside public areas yet this part of the harbour is occupied by many users that have no relationship with the harbour.</p> <p>We consider that the Development Brief should address this problem.</p> <p>There would appear to be a huge potential to develop this sheltered south facing side of the Aldrington Basin. Residential properties with adjacent marinas in this situation would have high values which could subsidise much needed social housing. The Lady Bee and Nicholson Marinas are already in place which suggests that residential developments with quayside access could successfully be located along the northern side of the basin without any interference to the work of the Port Authority.</p> <p>The western end beyond the Texaco depot is undeveloped and the natural line of the cliff face is clearly apparent. The area has potential for recreational use although access from the A259 will need to be improved. This stretch of the A259 coast road has spectacular views across the harbour which would need to be preserved in any future development.</p>
	<p>3.4.1 Historical Assets</p> <p>The northern edge of the basin includes most of the historic assets of the harbour and should be detailed in Para 3.2. of the Development Brief.</p> <p>The old coast road between Brighton and Shoreham runs beneath the natural cliff face. The line of the road remains intact for most of its length, made up of various access roads and track. Important buildings that should be noted in the Development Brief are:</p> <p>Substantial Victorian Warehouses on the Travis Perkins site. Used for storage of substantial quantities of Imported ice during the 19th Century.(Fig 12)</p> <p>Early 19th Century coastguard cottages and a group of Victorian buildings above Nicholson Wharf.</p> <p>The Port Authority buildings and the numerous industrial buildings at the locks.</p>
	<p>3.4.3 Cycle routes</p> <p>As previously stated, most of the old coast road remains intact which could be used as a basis for a cycle route along the north side of the harbour between Hove and Shoreham. A cycle route would be an ideal way to provide access to the undeveloped green area between Portslade and Shoreham. (Fig 13).</p>
	<p>3.4.4 Design</p> <p>The design of buildings along the northern edge would need to acknowledge the industrial character of the area and also take account of the open “maritime” nature of the coast road (Para 5.2.6 of the Development Brief). The views across the harbour are spectacular along this length of the coast where it runs along the top of the old cliff face and the brief should highlight the importance of retaining this asset.</p>

	<p>One of the substantial Victorian warehouses on the Travis Perkins site has been converted to live/work units and is an excellent example of how this area could be developed. Only a single storey building runs along the southern side of the A259 with views across the harbour intact on either side of the building. All the units in this substantial building have south facing aspects with views across the harbour – a sustainable and high premium residential development. In addition the industrial character of the building has been successfully utilized in the design. (Fig 14).</p>
	<p>4. Definition of Port associated uses and general industrial/employment uses</p> <p>There does not appear to be any differentiation in the Development Briefs between uses which have a strong relationship with the Harbour and the Port - in terms of needing to be located where they are – and land occupied by general commercial and industrial uses which could operate anywhere within the West and East Sussex and Brighton and Hove areas.</p> <p>In order to be able to make intelligent decisions about priorities for land uses within the harbour area it would seem to us that it would be essential to have this information available.</p> <p>For example the strip of land between Hove Lagoon and Aldrington Basin discussed in para 3.1 above is occupied by a scaffolders yard – there would appear to be no reason for this to be where it is if an alternative location could be found.</p> <p>There are many other firms situated on harbour land with no apparent direct links to Port activities where this situation also applies.</p>
	<p>5. Height and scale of new developments</p> <p>We support the section Urban Design, particularly para SPAB7 which deals with building heights and townscape considerations. We consider it very important that the built up areas of the seafront have a consistent height and are not compromised by tall blocks as have been areas of the seafront near the central part of Brighton seafront. We are opposed to policies included in BHCC’s Policy SPG 15 (Tall Buildings) that propose areas where tall buildings are deemed to be acceptable on the seafront.</p>

Rep no: 2017

Consultee: 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
	I support them; relevant and sustainable
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments
	Priority should be given to cyclists and encouraging cycling

Rep no 2018

Consultee: Individual

OTHER COMMENTS	
Reference	Comments
SPAB6 / SPAB7	We refer to the above brief and specifically to the sections on building heights, SPAB6 and SPAB7. Whilst four storey buildings may be acceptable on the north side of Kingsway they would not be acceptable on the south side. Four storey buildings would give lengthy overshadowing of houses on the north side of Kingsway during winter. We therefore consider that the maximum height of buildings on the south side of Kingsway should be limited to two storeys.

Rep no: 2019

Consultee: Individual

OTHER COMMENTS	
Reference	Comments
	Having looked at your excellent presentation of the Briefs, I would like to make the following comments. My chief concerns are: 1. Increased pollution in an already highly-polluted area.

	<p>2. As I swim 6 months of the year, easy access to the seafront from the Kingsway west of the Lagoon is important. As you rightly say in your brief, it is an unpleasant and dangerous section of the A259 and anything which reduces the number of HGVs using it would be welcome. Conversely, any increase in traffic would not be welcome. Do you think there is scope for widening the road by reducing the pavement on both sides?</p>
	<p>3. My main interest is the PortZed area. Something attractive is needed there, but not above the height of the new ex-Caffyns' site building. Where it impinges on the Port Basin area, it is obviously going to create more traffic, so an improved extension of the Basin Road to the Boundary Road traffic lights, or better still the Church Road lights, or even better both, would be a huge improvement, and if the HGVs could use that/those exits, that would greatly improve the air quality for the residents of the Kingsway from Brittany Road west.</p> <p>I do appreciate that not all the land in question is owned by the Port Authority, but to me it seems senseless that a private developer can go ahead without the Port's approval. I do hope the Port Goliath can take note of the concerns of all the little Davids who are its neighbours.</p> <p>Thank you so much to the helpful gentleman who spent time discussing the plans with me at the City Coast Centre, and for the excellent maps. I feel I now have a grasp of what is planned, and it 's very exciting. Here's hoping the finance - or lack of it - doesn't scupper the plans.</p>

Rep no: 2020

Consultee: 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? NO	
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.

Rep no: 2021

Consultee: Deloitte (on behalf of Cemex)

OTHER COMMENTS

Reference	Comments
CEMEX Shoreham	<p>We write on behalf of our client CEMEX UK Ltd to provide representations on the Draft Shoreham Harbour South Portslade and Aldrington Basin Development Brief.</p> <p>Deloitte is instructed by CEMEX to advise on planning related matters in respect of its assets at Shoreham Harbour. CEMEX has an active interest in the formulation of planning policy in the Shoreham Harbour area. Within the Shoreham Harbour area, CEMEX owns one site, the extent of which is shown on the attached plan.</p> <p>Cemex is a global supplier of cement, ready mixed concrete and aggregates, with operations in more than 50 countries. The site is operational and provides wharf facilities essential for the supply of aggregates to east Sussex and across the South East. Due to the location of the site, adjacent to the Portslade Industrial estate, our comments focus only on the Development Brief for South Portslade Industrial Estate and Aldrington Basin and are not concerned with the Western Harbour Arm Development brief. Deloitte have previously submitted representations on the Adur Draft Local Plan in October 2012.</p>
Vision and Objectives	The vision for Shoreham Harbour states that by 2028, the Harbour will be the location of a series of sustainable, mixed use developments, alongside a consolidated and enhanced Shoreham Port, which will continue to play a vital role in the local economy. CEMEX understands the objectives of introducing mixed use development to Shoreham Harbour,

	<p>but urges the Council to ensure that existing and viable employment uses in the Basin Road North area are safeguarded. The Development Brief references the 2010 Shoreham Port Masterplan on page 26, which designates the CEMEX site as a safeguarded Wharf.</p> <p>Industrial land uses at Shoreham Harbour, including CEMEX's site located at Basin Road North, are important economic generators for the local area and the Local Plan should reflect this by safeguarding and maintaining such uses. Objective 2 of the development plan states that there will be continued improvement of the business environment in the area to support the needs of existing businesses. CEMEX welcomes this initiative.</p> <p>Objective 4 states that to address shortfalls in local housing supplies, new homes of a range of sizes need to be delivered in the area. CEMEX agrees to this objective in principle, however it is important that new residential development in no way prejudices the continued operation of local employment functions.</p>
SPAB1	Policy SPAB1 proposes that South Portslade retains employment uses as the predominant land use. This policy is supported by CEMEX.
SPAB3	Policy SPAB3 states that South Portslade Industrial Estate and Aldrington Basin will continue to perform a key economic function in the area. This policy is also supported by CEMEX.
SPAB2	Policy SPAB2 recognises that existing and new employment functions must co-exist with proposed residential uses. CEMEX broadly supports this policy, however the responsibility of ensuring that noise generated by local employment functions does not disturb new residents should fall with developers. Restrictions should not be put in place for existing employment uses.
SPAB13	Policy SPAB13 states that noise implications should be considered at an early stage of the design process for new development in order to avoid any significant adverse impacts on health and quality of life. Mitigation measures must be factored into the design of new residential development to provide acceptable levels of residential amenity.
Summary	Overall CEMEX is broadly supportive of the objectives to regenerate the Shoreham Harbour area, however the introduction of residential uses to Aldrington Basin should be limited and located away from the quayside in order to avoid prejudicing port operation and adjacent employment uses. The continuation of economic functions in the area is important for the local economy and mitigation measures must be factored into the design of new residential development to provide acceptable levels of residential amenity and allow the continued operation of the CEMEX site.

Rep no: 2022**Consultee: Individual**

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic? YES	
Reference	Comments
	Para 1.2.2 New housing opportunity around Aldrington Basin requires further discussion and amendments, regarding location suitability, heights and problems to existing port businesses and to existing houses on Kingsway.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area? YES	
Reference	Comments
	In general we agree but we are concerned that it is important to agree the transport details around Aldrington Basin before looking at detailed development of buildings. Pedestrian and cycle access and route around Aldrington Basin and along the busy Basin Rd South need much improvement, better, clearer signposts, safer crossing and dedicated paths and cycle tracks. Opening up the link between Aldrington Basin and Hove lagoon would be welcomed. More tourist and leisure attraction, boats, tall ships, local museums and possible creation of a local heritage site bases on the historical river, canal and 'Daisy Salt lake' Hove Lagoon. Better cycle racks in keeping with art deco style possibly 'Penny farthing' racks.
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments
	We support continuation of existing port use for fishing and small business use around the Basin. We question whether it is a good idea to create a new residential complex on Basin Rd North rising up onto south Kingsway with conflicts to port use and existing residential properties to the north. We consider that figure 4.4 shows new housing on Kingsway level which is inconsistent with other constraints mentioned in the brief, particularly open outlook, massing, overshadowing and height in relation to existing houses on the north side of the Kingsway. This figure 4.4 should be removed.
Q4: What are your views on the Guiding Principles for the Development Brief Area?	
Reference	Comments
SPAB7	5.2.4 South Kingsway seems to be the only new proposal for residential building which blocks light and sunlight significantly to existing properties to the north. The proposed 4 storey building of 12 metres height would significantly affect 2 storey houses opposite, depriving them of the natural sunlight and light enjoyed for 80years or more. Passive heating to front rooms and solar photovoltaics would be affected, especially in the winter months for up to 11 weeks. As the building would be on a narrow strip of land with 2 floors on Basin Rd North a new level on the Kingsway would be created with little setback opportunity. The height should be limited to 6 metres(a 'normal height' 2 storeys) above the Kingsway. It would be possible to achieve this with the ground floor on Basin Rd North for parking or business and

	residential accommodation of 3 floors above with no the flood risk there.
Q5: Do you have any further comments on the Draft Development Brief?	
Reference	Comments
5.2.6	The brief states that the scale and massing should reflect the open maritime brightness of Kingsway with openness with good views through any development. Without setback the buildings will be tight up to the edge of the narrow Kingsway pavement which will further cause massing and overshadowing of the houses across the road. There should at least be a modest setback to comply with the existing building lines at Blue Lagoon Bar, Pets Corner and Woodies.
	Please see Appendix 1, 2 and 3 with separate attachment of pictures and cross sections showing shadowing effects, on north Kingsway, of 10 metre lamp posts very close to the south Kingsway potential development site. There are also cross sections to show various heights of any development there. There are some photos of the Vega/Caffyn's ste building with generous setback on north Kingsway and Blue lagoon Bar, Pet's Corner and Woodies restaurant and shop with modest setback on south Kingsway. Included are some model pictures relating to 5 storey blocks development on the same site, unanimously rejected by Brighton and Hove City planning committee in Feb 2012 on the grounds of massing, loss of sunlight and light affecting existing houses and detrimental to the local townscape in west Hove.
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments
	Residential accommodation on the south side of the Kingsway would produce a difficult conflict with existing business activity in Basin Rd North and Aldrington Basin. There would be likely complaints from occupants about noise and activity at unsociable hours such a early morning. Sustainable development should not increase the carbon footprint of existing houses by reduce their light, sunlight and solar gain by passive heating and PV input.
OTHER COMMENTS	
Reference	Comments
	Appendix 1 These are pictures we took of lamp post shadows in winter on Kingsway opposite Aldrington Basin. They demonstrate that the 10metre high lamp post cast shadows on the front of the existing houses. Any tall development, as shown in the brief, on the north side of Basin Road North and south side of Kingsway, would seriously deprive light and sunlight to existing houses. For this reason we consider 6metres above the Kingsway is the maximum which should be proposed or allowed.
	Appendix 2 In February 2012, a development application, for 6 blocks of apartments on the south side of Kingsway, was unanimously rejected by BHCC planning decision committee, for the following reasons: <ul style="list-style-type: none"> • Applicant has not demonstrated that site is appropriate for a tall building in the context of existing development

	<p>to the north and south, and emerging plans for future development of Aldrington Basin.</p> <ul style="list-style-type: none"> • Development's constant and unvarying height and massing would create a sense of bulk that would appear excessively out of scale and create a visually overbearing relationship with development to north. • Absence of robust information about noise, plus lack of mitigation measures, has significant potential to expose existing and future residents of development and adjoining area to excessive and unreasonable levels of noise • In the absence of sufficient justification for development of this scale in this location the development would result in a loss of light that would be significant and harmful to living conditions for occupiers of properties on Kingsway fronting the site. <p>We made a model to scale in 2011 to check on claims and promotions made by the developer at that time. The model was to scale and we used the developers plan of the site on Kingsway. It showed the 6 blocks, 5 storeys high but 18 metres above the Kingsway. We took pictures in the open from our balcony. The model was aligned with spirit level and compass.</p> <p>In this development, the massing, shadowing and removal of open aspect over Aldrington Basin was obvious and led us to question the developer's claims. Our response to the Shoreham Harbour brief discusses what we believe to be a reasonable height (6metres) above the Kingsway, in keeping with the local townscape and open aspect to the south, over the harbour at Aldrington Basin and sea beyond.</p>
	<p>Appendix 3</p> <p>We attach cross sections showing various height from existing to 6 storeys above Kingsway.</p> <p>We question the wisdom of residential apartments on this narrow site, sandwiched between heavy traffic on either side. We believe that if residential units must be built there, they should not exceed 6 metres in height. They should also have a modest setback following existing building lines on the south side of Kingsway.</p> <p>We attach several pictures to show setback of building on both side of Kingsway, Hove:</p> <p>Picture of the almost completed, 4 storey, 12 metre development, Vega, on the old Caffyn's garage site. It has a generous setback in line with other houses and shops nearby on the north side of Kingsway. This development is 12 metres high, slightly below ground level at the Western end. It gives us a guide to height relative to the local 10 metre lamp posts.</p> <p>Pictures of existing buildings on the south site of Kingsway, on either side of the suggested residential site shown in the brief. Existing setbacks are generous or modest. Blue Lagoon Bar, existing Britannia house, Pet's Corner and Woodies restaurant and shop are shown.</p> <p>A picture of the steep narrow 'residential site' between Kingsway and Basin Road North.</p>

Rep no: 2023

Consultee: Individual

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?	
Reference	Comments
Vision	Agree with paragraph 1.2.1, but in relation to paragraph 1.2.2 KAWHRA's above-referenced survey form explained why we believe the deliverability of housing at Aldrington Basin needs further consideration.
Objectives	Generally agreed - <ul style="list-style-type: none"> • 1.3.1 Concern if renewable energy generation includes wood-fuelled boilers due to emission and AQM issues. • 1.3.2,1.3.3, 1.3.8 & 1.3.9 - Strongly agree • 1.3.4 As stated above, and in later sections, Aldrington basin - (the very thin strip of land between Kingsway and North Basin road) not considered suitable for residential development.
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	
Reference	Comments
	<p>Please Note: I am impressed and very positive about the majority of the overall Shoreham Harbour Regeneration draft development proposals. However I have a key concern at the references to developing the Kingsway/north basin road strip of land with a dense fill of 3/4 storey above Kingsway level of residential units. This appears out of context with the Vision and Objective statements, and subsequent sections of the draft. It appears to be driven by the Section 2.2 "Adopted and Emerging Planning Policy Guidance" statement 2.2.2. that "Shoreham Harbour identifies the potential for 400 new homes...."</p> <p>My concern was further heightened at the workshop when an additional target was stated of 100 domestic units within Aldrington basin.</p>
Section 3	<p>Section 3 appears to be mostly descriptive of the existing situation.</p> <p>I am of the opinion that a more searching study of constraints followed by opportunities is required, and would have clearly identified that the thin strip of land between Kingsway/North basin road is unsuitable for residential development(for reasons given later). I consider that more emphasis is needed on the tourist opportunities at this location and promotion of more associated commercial activities such as a craft centre promoted by improved open visual impact of the canal from the Kingsway of tallships and maritime exploration vessels etc.</p> <p>This could be achieved by commercial buildings no more than 6 metres high above Kingsway and generous spaces between buildings along the Kingsway, and maintaining the same existing 10 metre setback from the Kingsway in order to both preserve and enhance the pedestrian environment for the benefit of both neighbours and tourists. This open aspect is also required to disperse the Kingsway traffic fumes in this AQM controlled area.</p>
Q3: What are your views on the Illustrative Framework for the Development Brief Area?	
Reference	Comments

<p>Fig 4.4</p>	<p>It appears that the absence of a comprehensive section on constraints and opportunities, plus the adoption of Section 2.2.2 planning guidance policy regarding number of dwellings to be added has resulted in a very misleading illustration showing a continuous high density fill of around 6 storey (3 -4 above Kingsway level) domestic dwellings.</p> <p>The overall report indicates that whilst the South Portslade Industrial Estate provides scope for domestic dwellings the Aldrington basin is characterised by Port and commercial activities that should not be prejudiced by noise etc constraints of an implanted residential development.</p> <p>Recommend this figure be deleted as it is in conflict with many guidance issues elsewhere in the draft, and further information provided later in my survey form.</p>
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Q4: What are your views on the Guiding Principles for the Development Brief Area?

Reference	Comments
<p>SPAB1 5.1.4 & 5.1.5</p>	<p>Do not agree with references to opportunity to develop the strip of land between Basin Road North and Kingsway</p>
<p>Constraints To Residential Development of North Basin Road/Kingsway Strip of Land</p>	<p>1.0 Daylight/Overshadowing Impact on Residents North Side of Kingsway As described in KAWHRA's detailed submission, building heights above Kingsway level need to be limited to height of 6 metres.</p> <p>2.0 Preserving Visual Impact Along Kingsway and Dispersal of Traffic Fumes. Need for generous and regular spacings between buildings, and maintain setback of around 10 metres.</p> <p>3.0 Noise Constraints and Noise Survey Results Your draft report emphasises need to prioritise on Port and commercial activities in Aldrington basin, and avoid noise constraints that would impact on potential to develop these activities. If the thin strip of land between Basin Road North and Kingsway includes a residential development noise level survey results are required to identify if this becomes an issue. A survey was carried out in early April 2011, and adopted the earlier NEC Category of noise level classification. This survey measured noise levels (primarily traffic noise, plus some Port activity noise) set back 10 metres from the Kingsway. This provided average results of daytime 68 db and night time 63 db, which were at the upper end of Category C, which as you are aware states " Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there is no quieter site available..." If corrected for a minimal setback distance from the Kingsway and updated 2 years to reflect any escalation of traffic density along the Kingsway it is anticipated that the representative noise level may well be in the highest level NEC Category D, that states " Planning permission should normally be refused". Hence should this site be developed for residential use there would appear to be need to impose severe constraints on Port and commercial activities, and even the proposed development of the North Basin road may add</p>

	unacceptable additional noise levels. Various other points are made in the KAWHRA submission, such as building heights and townscape considerations.
Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?	
Reference	Comments
	Suggest this includes all emissions (to include fine particulates from wood-fuelled boilers) and noise.

Rep no: 2024

Consultee: Robinson & Co (on behalf of Hopegar Properties Ltd)

Q1: Are the vision and objectives for the Shoreham Harbour Regeneration Area appropriate and realistic?	
Reference	Comments
	Vision is seen as attractive by my clients but it is broad and long term (2028). Not all the objectives can be achieved throughout all different areas of the Port and priorities should be stated. [Aldrington Basin is different to South Portslade, and no comments are made here about the latter.]
Q2: Does Section 3 reflect all the opportunities and constraints within the Development Brief Area?	
Reference	Comments
	My clients own a site (Mackleys Wharf) with frontage to the Basin and consider the potential for it and the surrounding area is still being underestimated. See accompanying letter.
OTHER COMMENTS	
Reference	Comments
	I write on behalf of Hopegar Properties Ltd. They own Mackleys Wharf, immediately south of Basin Road North and in Aldrington Basin. Their total site area is approximately 5,300m ² with a factory (1050m ²) on the north (against the road), to the south the wharf itself (2,800m ²), and between them ancillary open storage (1,080m ²). Access is on the western side of the site (350m ²). Clearly this is a substantial landholding and constitutes a significant interest in the Port and surroundings. Consent was granted in 2002 for B2 use of the factory for 10 years (BH/2002/01978) and this was renewed in September 2010 to extend the expiry date to 30/9/2015 (BH2010/02484). My clients commented on the Draft Development Briefs for Shoreham Harbour in November 2012 and I attended the Briefing on 7/3/2013. They ask you to take the following comments into account in further work on the JAAP.
Vision	As mentioned on the survey form the Vision (1.2.1) for the Harbour is considered attractive. The Vision does not however apply equally, everywhere in the Harbour (and fits less well with South Portslade, a different area).

Objectives	Multiple objectives are set out in 1.3.1. It may be appropriate to clarify which objectives apply, where in the study area: and to prioritise them.
Hove Lagoon and Aldrington Basin	<p>A key proposal in October 2012 was to introduce a range of new uses to the eastern end of the Canal and link across to the Lagoon. This, we commented at the time, should be considered carefully and the mix of uses needed to make it viable worked out</p> <p>Fig 6.12 showed industry, residential and leisure uses between the Canal and the Lagoon. That would be a start towards changing the eastern end of the Canal from a heavily industrial part of the Port to one where there were more visitors and the quayside became accessible and an attractive amenity.</p> <p>A suggestion my clients put forward was that it might be possible to make a water connection to the Lagoon and to have a Marina in the eastern end of the Canal to add visual interest to the area.</p> <p>The current Briefs continue to aim for this connection to be made. In the discussions on 7/3/2013 the point was made that a north-south route through the Port had to be kept clear for HGV traffic. This means that the east-west connection will be for pedestrians at ground level.</p> <p>The degree of change now planned for the eastern end of the Canal is modest. Figure 4.4 is a great improvement on the situation today but the single-storey boat sheds illustrated make little of the location's potential.</p> <p>Some interest will be created by having attractions, such as a Tall Ship, moored there and any redevelopment should allow for public access to the wharf side.</p> <p>My clients continue to support the aim of extending leisure and visitor interest westwards from Hove Lagoon and would be interested to see further details of this.</p>
Residential or Employment Priorities	<p>It was felt in October that the Briefs did not fully explore the potential for new uses including residential in Aldrington Basin. Then, you were referred to the Hyder "Masterplan" for the Port (November 2010) which describes Aldrington Basin as</p> <p>'..probably the most challenging and exciting area for change.'(6.15)</p> <p>It identified (6.15) 5.9Ha land area of which the majority is in private ownership</p> <p>The same report (M-6.16) looked at infilling some of the Basin and came to the conclusion that the turning head in the Canal was a constraint but might be re-modelled and there was a longer term opportunity to do this at some cost. The Briefs should follow this through in more detail.</p> <p>The need for housing in Brighton and Hove (and Adur) deserves a lot of weight. We argued in 2013 that Scenario 2 for Aldrington Basin should look more critically and positively at the potential for some housing in the area and weigh the costs and benefits carefully.</p> <p>The only residential area now being considered in Aldrington Basin (5.1.4) is south of Kingsway and north of Basin Road North. The Draft Briefs now turn against any housing facing the Basin, and in the opening presentations we were told on 7/3/2013 that residential development in Aldrington Basin had been 'jettisoned' as an idea.</p> <p>That may not be a view which will prevail in the long term but if it is accepted in the JAAP the implications for my</p>

	<p>clients are important. Employment and the future of the Port risk being compromised if any nearby residential uses are allowed to conflict with them.</p> <p>Port activities obviously include the use of heavy equipment, ships being loaded and unloaded at any time of day or night, HGV traffic and other intrusive processes. Residential uses must therefore be effectively protected against noise and disturbance from Port uses.</p> <p>Equally, the development of Port uses should be encouraged and restrictions such as those imposed on my clients development (in accordance with current policy EM12) should be lifted. The Briefs say (5.1.4) ‘Other sites – the refurbishment and enhancement of existing activities and sites in the remainder of Aldrington Basin will be encouraged. No fundamental redevelopment or introduction of new uses is proposed’</p> <p>My clients would support this approach if it makes clear that EM12 no longer applies and the whole range of uses (including B2 and B8) are expected to take place on the north side of the Canal, where their site is (and is covered by the above, ‘Other sites’). It should also make clear that Basin Road North (see below) will itself be a busy, noisy two way access road for the Port.</p> <p>Any residential which is close enough to be (potentially) affected environmentally should be properly protected .</p> <p>My clients therefore support inclusion of ‘appropriate mitigation to avoid harm to resident amenity’ (5.1.6/ 5.1.7.) For the avoidance of doubt this must make clear that it is the residential development which will include the relevant measures.</p>
Basin Road North	<p>Improvements to Basin Road North were “proposed” in the Masterplan 6.20 and details of how it would work were given. This is still underplayed in the Briefs although it does appear to be something to which the Port is progressing. Figure 3.5 shows the proposal but 3.3.1 says only that ‘This could be achieved’.</p> <p>It also appears that there is an opportunity for change through the vacancy of the corner building (in the SW of the junction between Basin Roads North and South).</p> <p>Basin Road North and the junction with Wharf Road at present are so unattractive that it is in the interests of adjoining landowners to see it widened and the junction enlarged and landscaped. This would alter the impression for people coming into Basin Road North from the east so it was no longer a narrow dark canyon.</p> <p>The local benefit would be immediate and would not depend on completion of the rest of the link to Church Lane</p> <p>The new Basin Road North link is still seen as very significant. A scheme should be designed and costed as part of the JAAP and may deserve priority in the local transport plan albeit the road is currently part of the Port.</p> <p>My clients support the improvement of Basin Road North as a two-way link into the Port from Trafalgar Road.</p>
Flooding	<p>It still does not appear that anything will be done to prevent the rare tidal flooding of the Canal</p> <p>If (in the short to medium term) there is to be redevelopment along Kingsway, it should include provision for bridges over Basin Road North and means of escape on foot through to the A259, which is above flood level. Bridges could be constructed into the upper floors of whatever is build facing the Canal, or there could be stairways prior to redevelopment.</p>

	In due course the access could lead down to amenity areas on the Quayside and help visitors. SPAB12 should include reference to escape routes to Kingsway, assuming that the risk of the Basin flooding cannot be removed.
Tall Buildings	An opportunity for some tall buildings in the Brighton and Hove part of the Harbour is also being missed. There is no discussion about tall or high buildings in Section 6 of the Briefs which deals with Aldrington Basin although this issue is touched on in sections dealing with other parts of the area e.g. South Portslade. Shoreham Harbour is recognised as a site with “the potential for taller developments, defined as 18 metres or more in height” in the Tall Buildings SPG15 (2003) at 15.6.5 The potential for some tall buildings in the Brighton and Hove part of the Harbour has been recognised in other statements by the City Council and should not be overlooked in the Briefs. SPAB7 mentions modest development heights (5.2.4) of four storeys and less. These are not tall buildings and my clients continue to feel that there is an opportunity for higher developments in the Harbour, which is unusual because it has sites which are not constrained to the south, yet are sheltered from the open sea.

Rep no: 2025

Consultee: Lambert Smith Hampton (on behalf of Penneys Wharf Limited)

OTHER COMMENTS

Reference	Comments
	<p>On behalf of the Directors of Penneys Wharf Limited, the owners of the land and buildings at Penneys Wharf, I would like to make the following representations on the above document. I attach a location plan that identifies the location of Penneys Wharf.</p> <p>The comments below all relate to Section 5.1 of the draft Development Brief, which sets out the Guiding Principles for development within Aldrington Basin. The Directors of Penneys Wharf have no specific comments in relation to other Sections in the draft Development Brief, but would offer the general observation that more consideration should be given to issues of financial viability. It is acknowledged that financial viability is touched upon in the draft Development Brief at paragraph 5.4, but it is considered that there should be a direct reference to measures that ensure financial viability – including a wider range of uses to reduce financial risk and increase attractiveness to a wider range of investors.</p> <p>Within Section 5.1, it is considered that in general terms the guidance is too narrowly drawn and fails to take advantage of the full range of opportunities offered by Aldrington Basin. The introduction to this Section at paragraph 5.1.4 suggests that there are four different forms development that would be acceptable within Aldrington Basin. However, in relation to the fourth group – ‘Other Sites’, which includes Penney Wharf in part – it is indicated that refurbishment and enhancement of the existing sites and activities will be encouraged but that no new development is</p>

proposed. Similarly, the introduction of new activities is likewise not envisaged in this group of buildings. Whilst such an approach might be appropriate in relation to some buildings within this group centrally located within Aldrington Basin, this approach is not appropriate in relation to Penneys Wharf. Indeed, it is considered to be myopic approach that fails to take full advantage of the opportunities offered by Aldrington Basin, and in particular represents a missed opportunity to integrate Aldrington Basin with the surrounding pattern of development. This is because Penney Wharf occupies a position adjacent to the Hove Lagoon, therefore offering the opportunity to enhance both the social role of the Lagoon and the economic viability of Penneys Wharf. This could, for example, be achieved by the introduction of retail and/or leisure uses at Penney Wharf that complement the activities at Hove Lagoon, thereby increasing the offer at Hove Lagoon. This would be consistent with paragraph 5.1.14 of the draft Development Brief, which indicates that ancillary retail and visitor uses will be encouraged on sites adjacent to Hove Lagoon. It would also be consistent with paragraph 5.1.17, which proposes retail uses at Aldrington Basin, particularly where they enliven key frontages. In the light of the guidance in these two paragraphs, there would appear to be an inconsistency between paragraph 5.1.4 and subsequent paragraphs, and it may therefore be the case that these concerns could be addressed by a redrafting of the advice in relation to ancillary uses in the Development Brief. The development of Penneys Wharf for these types of uses would be entirely in accordance with the guidance in the National Planning Policy Framework (NPPF), which confirms that sustainable development is defined as comprising social, economic and environmental elements. The introduction of retail and/or leisure uses at Penneys Wharf would achieve each of these elements; social, in terms of increasing the recreational value of Hove Lagoon; economic, in terms of ensuring a viable economic use of the premises; and environmental, in terms of the enhancement of the premises resulting from an economically and socially viable use. The introduction of retail and/or leisure uses at Penneys Wharf would therefore constitute sustainable development as defined by the NPPF and, as such, would benefit from the presumption in favour of sustainable development enshrined in that guidance. Two ancillary points arise from the above. Firstly, the introduction of retail and/or leisure uses at Penneys Wharf use would not necessarily require the complete cessation of employment uses. Indeed, the optimum development could comprise a modern employment-led use generating a similar number of jobs as at present, if not more, with the additional bonus of retail/leisure uses. This type of mixed-use would also be entirely in accordance with the presumption in favour of sustainable development enshrined in the NPPF. Secondly, it is noted that one of the four groups identified in the draft Development Brief that would be acceptable within Aldrington relates to the sites adjacent to Hove Lagoon, north of the Newhaven & Brighton Fish Sales site. This site is identified in the draft Development Brief as being suitable for fit-for-purpose employment development. This site is within Penneys Wharf and it follows that the comments made above would apply equally to the site as a whole. This immediately opens up a potential opportunity going forward of developing the site referred to in the Development Brief as part of a wider redevelopment of Penneys Wharf. The joint development of these sites for an employment led

mixed-use scheme would make more efficient use of the available land and could potentially unlock a greater value in terms of development opportunity than the development of these sites in isolation. Whilst the owners of Penneys Wharf would not at this stage wish to commit to a redevelopment on this basis, the potential to do so should be recognised in the Development Brief (and subsequently in the Joint Area Action Plan for Shoreham Harbour).

The Development Brief confirms at paragraph 5.1.5 that a target of 400 new residential units is set by the emerging Brighton & Hove City Plan. The foregoing has suggested an employment-led mixed use is a sustainable form of development in relation to Penneys Wharf, and there is no reason in principle why an employment-led mixed use should not include an element of residential. It is recognised that Aldrington Basin is within an area liable to flooding and that any proposed residential use would be required to meet the 'exception tests' set out in current guidance. However, the logical location of residential units in an employment-led mixed use scheme would be on upper levels, leaving means of escape as the prime consideration in relation to flooding issues. Moreover, the introduction of residential units at upper levels would bring beneficial activity to the locality and would complement retail uses within mixed use schemes. For these reasons, it is premature to dismiss the possibility of incorporating an element of residential into an employment led redevelopment of the Penneys Wharf site and it is considered that this should be reflected in the Development Brief.

In that context, the contention at paragraph 5.1.7 of the Development Brief that residential use is not compatible with port land and port activities is not accepted. The compatibility of these two uses is a function of design, and in principle it is entirely possible to design the interface between the uses in such a way that a residential use can be continued without detriment to the amenities of the occupiers or prejudicing the activities of the port.

In summary, it is considered that the Guiding Principles for development within Aldrington Basin are too narrowly drawn and fail to take full advantage of the opportunities presented by Aldrington Basin. One of these key opportunities is the proximity to Hove Lagoon. The Penneys Wharf site is in a prime position to exploit the potential linkages between Aldrington Basin and Hove Lagoon. However, as presently drafted, the draft Development Brief does not provide the policy framework with which to maximise the benefits that could result from the redevelopment of the Penneys Wharf site. It is therefore considered that a more flexible approach should be taken to the potential redevelopment of the site, in particular the possibility of an employment-led mixed use scheme incorporating elements of retail, leisure and residential uses. Such an approach would not only make the most efficient and beneficial use of this site, it would be entirely in accordance with the presumption in favour of sustainable development enshrined in the NPPF.

Rep no: 3001**Consultee: 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?

Rep no: 3002**Consultee: Economy, Transport and Environment Department, East Sussex County Council****OTHER COMMENTS**

Reference	Comments
	<p>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</p>

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.

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.

Rep no: 3004

Consultee: 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,</p>

	<p>which would require a long and possibly expensive journey. Apart from pubs and restaurants, are there any indoor 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?</p>
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	<p>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?</p>
<p>Q6: Do you have any comments on the Sustainability Appraisal of the Draft Development Brief?</p>	

Reference	Comments
	Possibly over-optimistic

Rep no: 3005

Consultee: 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.

	<ul style="list-style-type: none"> • 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 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;"
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Rep no: 3006

Consultee: 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,</p>

	<p>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 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	<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</p>

Opportunities	<p>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 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	<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</p>

<p>Industrial Estate and Aldrington Basin</p>	<p>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: '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'. 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>
<p>Green space</p>	<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>



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