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Adur Local Plan 2014,
Planning Policy Team,
Adur & Worthing Councils,
Worthing Town Hall,
Chapel Road,
Worthing,
West Sussex,
BN11 1HA

1 December 2014

Dear Sir/Madam

Adur Local Plan Proposed Submission Consultation December 2014

We write on behalf of our client CEMEX UK Properties Ltd ('CEMEX'), to provide representations on the Adur Local Plan Proposed Submission Consultation 2014

CEMEX Shoreham

CEMEX has an active interest in the formulation of planning policy in the Shoreham area, and owns one site in this area (see attached plan). The address of the site is as follows:

Hall's Wharf
Basin Road North
Shoreham
BN41 1DN

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. Deloitte have previously submitted representations on the Adur Draft Local Plan in October 2012 and the Shoreham Harbour Area Action Plan in April 2014.

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Policy 8: Shoreham Harbour Regeneration Area

It is noted that Policy 8 identifies the harbour as a broad area for change with the introduction of a wider mix of uses within the Character Areas designated by the emerging Shoreham Harbour AAP.

CEMEX's asset is designated as a safeguarded wharf, which is shown as Halls Wharf on Draft Map 6. Paragraph 2.100 of the emerging Local Plan states that minerals wharves are safeguarded under Policy 40 of the West Sussex Minerals Local Plan (2003).

CEMEX have serious concerns regarding the proposed introduction of residential developments into this area. Despite the proposed policies which aim to ensure that any new residential development will not negatively impact the wharf uses, residential land uses are entirely incompatible with the current port heavy industrial use and the area should remain in exclusively commercial use. CEMEX has previously had established commercial operations in other locations in the UK severely compromised due to the introduction of neighbouring residential developments; these have then led to noise complaints that severely restricted operational hours and overall viability of the site. The continuation of recognised economic functions in the area is important for the local economy and new residential development should not be allowed to impact this existing use. CEMEX contends that introducing residential uses has the potential to be contrary to NPPF paragraph 143, which states (under 'Facilitating the Sustainable Usage of Minerals') that in preparing Local Plans, local planning authorities should "safeguard existing... wharves and associated storage, handling and processing facilities".

Paragraph 2.96

CEMEX therefore supports paragraph 2.96, which states that there is a strong commitment from the Partnership to ensure that any release of sites is backed up by an accompanying strategy which minimises impact on existing business operations and retains local firms and associated jobs in the area. If any residential development is located adjacent to operational wharves, then mitigation measures must be incorporated into the design of new development to provide acceptable levels of residential amenity and allow the continued operation of the CEMEX site.

Paragraph 2.97

In order to be compliant with NPPF Paragraph 143, paragraph 2.97 of the draft plan should be amended to read 'In the **long term** ~~the short to medium term~~ it is essential to ensure that the initial phases of development do not compromise the operations of businesses...'.
long term

Appendix 4: Shoreham Harbour Regeneration - Viability and Deliverability Progress Update

Paragraph 13 states that minerals wharf capacity at Shoreham Harbour makes a significant contribution to meeting the needs for aggregate imports in to the sub-region. CEMEX supports the inclusion of this statement which recognises the importance of wharves and is in accordance with NPPF paragraph 143.



Conclusion

CEMEX is pleased to have the opportunity to comment on the emerging development brief, and we ask to be continually involved, on its behalf, on the programme of future planning documents. Should you have any queries on this correspondence, please contact Mike Bottomley on [REDACTED].

Yours faithfully

[REDACTED]

pp John Adams
Deloitte LLP

Cc Christopher Clark, CEMEX



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Drawn By	CC
Checkd By	March 2013
Scale	1:2500 @ A3
Client	AS
Site Ref.	
Company	CEMEX UK Operations
Site	Shoreham (Esso Wharf)
Project	
Title	Freehold title
Drawn To	