SHOREHAM HARBOUR REGENERATION AREA

Housing TOPIC PAPER
## Contents

INTRODUCTION.................................................................................................................. 3
BACKGROUND TO THE SHOREHAM HARBOUR REGENERATION PROJECT.... 7
PARTNERSHIP WORKING AND THE JOINT AREA ACTION PLAN (JAAP) ........ 8
STRATEGIC CONTEXT FOR HOUSING STUDY ................................................................. 9
HOUSING NEEDS AND DEMAND ..................................................................................... 10
HOUSING LAND SUPPLY.................................................................................................. 13
CONSTRAINTS .................................................................................................................... 15
HOUSING TARGET ........................................................................................................... 19
CONCLUSION .................................................................................................................... 20
DELIVERY .......................................................................................................................... 20
1 INTRODUCTION

1.1 The councils consider that their approach to the Shoreham Harbour regeneration area in the Joint Area Action Plan meets the soundness tests set out in the National Planning Policy Framework (para 182) for local plan preparation in that:

- The Joint Area Action Plan has been positively prepared and has sought to meet objectively assessed development and infrastructure requirements as far as it is reasonable to do so and is consistent with achieving sustainable development in the regeneration area.

- The regeneration strategy for Shoreham Harbour set out in the Joint Area Action Plan is the most appropriate for the regeneration area and is justified when considered against the reasonable alternatives, based on proportionate evidence.

- The regeneration strategy for Shoreham Harbour is effective and is deliverable over the 15 year Joint Area Action Plan Period. It has addressed joint working on cross-boundary strategic priorities.

- The regeneration strategy for Shoreham Harbour is consistent with national policy and will enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

1.2 In developing a regeneration strategy for Shoreham Harbour, the councils have followed national guidance set out in the National Planning Policy Framework and Planning Practice Guidance for "sustainable development" and produced appropriate technical studies.

1.3 The purpose of this topic paper is to provide the background evidence to support the council’s approach to the regeneration of Shoreham Harbour. It should be read in conjunction with other topic papers submitted in support of the Joint Area Action Plan.

1.4 This topic paper addresses the following key issues in relation to the Shoreham Harbour Regeneration Area:

- Housing needs and demands
- Housing land supply
- Constraints
- Housing target
- Delivery

1.5 Shoreham Harbour is located partly within Adur District and partly within the City of Brighton & Hove. The councils seek to regenerate Shoreham Harbour and surrounding areas through delivery of the following vision and policies of the Joint Area Action Plan:
**Vision** – This sets out the overall spatial strategy for the delivery of development in the regeneration area:

“By 2032, Shoreham Harbour Regeneration Area will be transformed into a vibrant, thriving, waterfront destination comprising 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.

The redevelopment of key areas of the harbour will provide benefits for the local community and economy through increased investment, improved leisure opportunities, enhanced public realm and the delivery of critical infrastructure that will help respond positively to climate change.”

**Policy SH4: Housing and community** – Clause 1. sets a minimum housing delivery target of 1,400 new homes across the harbour area by 2032, comprising 1,100 within Adur and 300 within Brighton & Hove.

**Policy SH3: Economy and development** – Clause 1. sets an employment floor space delivery target for the plan area, including 16,000m² of new employment generating floor space in Adur and 7,500m² in Brighton & Hove.

Until the Joint Area Action Plan is adopted, the Port Masterplan, Interim Planning Guidance, Development Briefs, Policy 8: Shoreham Harbour Regeneration Area of the Adur Local Plan 2017, and policy DA8 – Shoreham Harbour of the Brighton & Hove City Plan Part One 2016 will be material considerations in determining applications within the harbour.

1.6 This topic paper will demonstrate that the housing delivery strategy proposed in this Joint Area Action Plan will boost significantly the supply of new housing to be delivered, taking account of other development needs and the identified constraints of Adur and Brighton & Hove.

**National Planning Policy Framework (NPPF)**

1.7 The National Planning Policy Framework (NPPF), sets out the Government’s planning policies and how these are expected to be applied. It provides a framework “within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities” (para 1). Its key message is a presumption in favour of sustainable development which is described as being a golden thread running through both plan-making and decision-taking. This is set out in paragraph 14 which states that for plan making this means:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient change to adapt to rapid change, unless:
  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
Specific policies in this Framework indicate development should be restricted.

1.8 This paragraph makes it clear that local planning authorities should plan positively to meet the development needs of their area and should meet objectively assessed needs unless there are significant adverse impacts of doing so.

1.9 This topic paper will demonstrate that the councils consider the regeneration strategy for Shoreham Harbour outlined in the Joint Area Action Plan is in compliance with the NPPF and the presumption in favour of sustainable development.

1.10 Paragraph 17 of the NPPF sets out the government’s twelve core principles for planning which should underpin plan making. These include:

- Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.

- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

- Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

- Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);

- Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
• Promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

• Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

• Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and

• Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

1.11 The NPPF states that “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development” (para 151) and should “seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued” (para 152).

1.12 The principle of sustainable development is embedded throughout the Joint Area Action Plan. The development strategy seek to balance the development needs in the regeneration area, including for new homes and jobs, with the need to continue to protect and enhance the high quality built and natural environment.

1.13 In preparing its strategy for the regeneration of Shoreham Harbour, the councils have taken account of guidance in the NPPF on building a strong, competitive economy (paras 18 – 22) which sets out how local planning authorities should “plan proactively to meet the development needs of business and support an economy fit for the 21st century” (para 20). Planning policies should “seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing”, “set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth” and “identify priority areas for economic regeneration, infrastructure provision and environmental enhancement” (para 21).

1.14 Paragraph 156 of the NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

• the homes and jobs needed in the area;
• the provision of retail, leisure and other commercial development;
• the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
• the provision of health, security, community and cultural infrastructure and other local facilities; and
• Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.15 As a broad location for change, the regeneration of Shoreham Harbour will boost significantly the supply of housing and employment floorspace, improve infrastructure and services throughout the area and enhance the built and natural environment of the area.

1.16 Paragraph 158 of the NPPF requires local planning authorities to “ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about economic, social and environmental characteristics and prospects of the area”. This includes housing, business, infrastructure, minerals, environment, viability and deliverability. In addition to the evidence base for the Joint Area Action Plan as a whole, specific evidence has been gathered to support the regeneration strategy for Shoreham Harbour.

2 BACKGROUND TO THE SHOREHAM HARBOUR REGENERATION PROJECT

2.1 Up to 2010 the redevelopment plans for Shoreham Harbour were being led by the South East Economic Development Agency (SEEDA) supported by the Local Authorities and Shoreham Port Authority. During this period there was potential for levering in significant Government investment in the site, along with other growth points identified in the South East Plan. The earlier plans for the harbour were therefore developed with a view to accessing this investment. However since that time significant economic and political change has taken place that has impacted on the approach to the harbour. SEEDA has been disbanded, the South East Plan (which established the principle of testing delivering up to 10,000 new homes at the harbour) has been abolished, significant changes to the planning system have taken place and public funding for major regeneration projects has been significantly reduced.

2.2 Since 2010 the local authorities have taken local ownership of the regeneration plans and set up a joint Project Board to work together with the Port Authority to advance a deliverable, realistic plan taking into account the impacts and aspirations of the local community, based on taking a more of a ‘bottom-up’ approach. The Joint Area Action Plan aims to provide a strategic framework and promote strategic catalyst sites for investment.

2.3 A Capacity and Viability Study (AECOM 2011) was commissioned to assess the quantum of new housing and employment floor space that could be viably delivered in line with the wider harbour vision. Viability analysis was undertaken to establish the funding gap between the value of the land and the full costs of the redevelopment that would need to be met to deliver the
required supporting infrastructure. The study also considered the potential of meeting the eco-towns programme criteria for which the harbour had earlier received a limited amount of funding.

2.4 Allies Morrison Urban Practitioners was commissioned in 2013 to prepare Development Briefs for the areas of the harbour facing most development pressure and where new housing is proposed. Viability appraisals were carried out for each brief that factored in up to date information since the earlier 2010 study was undertaken (Shoreham Harbour Western Harbour Arm Development Brief 2013).

2.5 The Joint Area Action Plan six week consultation period ran from 10 November 2017 to 22 December 2017. The current plans for the harbour aim to provide a pragmatic balance between the aspirations and ambitions for a new waterfront community and the commercial realities of bringing forward complex, brownfield sites.

2.6 The viability appraisal underpinning the emerging plan has helped to identify the costs of the enabling infrastructure – in particular flood defences, highways improvements and site assembly costs. The plan covers the period up to 2032 and funding will be required from a number of different sources. The Shoreham Harbour Regeneration Partnership is continuing to work closely with stakeholders and local service providers to identify social infrastructure needs and priorities.

2.7 The Partnership recognises that having the right internal governance structures and resources in place to support delivery is essential and significant progress has been made in this area. There are dedicated staff resource tasked with site owner/tenant liaison, facilitating relocations, pre-application engagement and accessing funding and delivery.

2.8 The Partnership is proactively seeking ways to reduce viability gaps and unlock stalled sites. For example through working closely with private land owners; maximising the potential of publicly-owned sites and accessing different sources of infrastructure funding (e.g. Growing Places LEP fund, City Deal), and working closely with key stakeholders such as the Environment Agency.

3 PARTNERSHIP WORKING AND THE JOINT AREA ACTION PLAN (JAAP)

3.1 Policy 8: Shoreham Harbour Regeneration Area of the Adur Local Plan 2017, and DA8 of the Brighton & Hove City Plan Part One 2016, outline on-going partnership work between Adur District Council, Brighton & Hove City Council, West Sussex County Council, and Shoreham Port Authority to support the regeneration of this area, including the production of the Joint Area Action Plan for the regeneration area and development briefs for key areas of change within the harbour area.

3.2 Paragraphs 171-181 of the NPPF set out the “duty to cooperate on planning issues that cross administrative boundaries”. Local planning authorities
should ensure that “strategic priorities across local boundaries are properly reflected in individual Local Plans” and “consider producing joint planning policies on strategic matters.” The Joint Area Action Plan was prepared by a partnership of local authorities working together across the boundaries. The regeneration project is jointly governed by Adur District Council, Brighton & Hove City Council and West Sussex County Council. Joint working arrangements are set out in a Memorandum of Understanding between the project partners. The Duty to Cooperate Statement (2017) sets out in more detail the cross boundary engagement in the preparation of this plan.

3.3 Paragraph 12-006 of the Planning Practice Guidance states that “the Government’s preferred approach is for each local planning authority to prepare a single Local Plan for its area”. However, additional Local Plans, such as Area Action Plans may be prepared if there is a clear justification for doing so. The Council considers that there is justification for producing a separate Joint Area Action Plan (in partnership with Brighton & Hove and West Sussex councils). This is due to the shared cross boundary priority of regenerating the harbour area, ongoing cooperation between the partner authorities and the specific opportunities and constraints of the Shoreham Harbour Regeneration Area. Detailed development proposals and policies for the area will be set out in the Joint Area Action Plan.

4 STRATEGIC CONTEXT FOR HOUSING STUDY

4.1 The Joint Area Action Plan seeks to deliver a package of measures over the plan period in order to:

- Work towards meeting the objectively assessed development needs of Adur and Brighton & Hove as far as possible, taking into account environmental assets and constraints and the capacity of infrastructure

- Facilitate the regeneration of Shoreham Harbour

- Meet the vision and objectives of the Joint Area Action Plan.

4.2 Many of the core principles of the NPPF are reflected in the Vision and Objectives set out in the Local Plan and which have helped shape the strategy for future development in Adur.

Vision:
2032, Shoreham Harbour Regeneration Area will be transformed into a vibrant, thriving, waterfront destination comprising 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.

The redevelopment of key areas of the harbour will provide benefits for the local community and economy through increased investment, improved leisure opportunities, enhanced public realm and the delivery of critical infrastructure that will help respond positively to climate change.
The Objective relating to housing delivery is as follows:

Objective 4: Housing and community:

To provide new homes and contribute to meeting identified housing need

To address shortfalls in local housing provision through delivering new homes of a range of sizes, tenures and types, including affordable and family homes as well as associated supporting community infrastructure.

4.3 Section 2 of the Joint Area Action Plan sets out the spatial strategy for the regeneration area, containing the vision and strategic objectives. It aims to balance development needs by proactively seeking to contribute to the objectively assessed housing needs of the councils as far as possible, providing employment sites and facilitating the delivery of infrastructure whilst taking into account environmental assets and constraints and infrastructure capacity.

4.4 The Joint Area Action Plan also guides development to the most appropriate locations. Realistic options for locating development will be achieved through the seven character areas, including four allocations for new development. These areas are:

- CA1: South Quayside
- CA2: Aldrington Basin
- CA3: North Quayside and South Portslade
- CA4: Portslade and Southwick Beaches
- CA5: Fishersgate and Southwick
- CA6: Harbour Mouth
- CA7: Western Harbour Arm

5 HOUSING NEEDS AND DEMAND

National Planning Policy Framework

5.1 Section 6 of the NPPF is entitled “Delivering a wide choice of high quality homes”. Paragraph 47 states that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in this framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.
Paragraph 007 states that local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.

Paragraph 010 states that a housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.

Where there is a joint plan, housing requirements and the need to identify a 5 year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.

Paragraph 018 states that plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. Any cross-boundary migration assumptions, particularly where one area decides to assume a lower internal migration figure than the housing market area figures suggest, will need to be agreed with the other relevant local planning authority under the duty to cooperate. Failure to do so will mean that there would be an increase in unmet housing need.

Joint Area Action Plan

Paragraph 3.4.2 of the Joint Area Action Plan states that housing needs assessments for both Adur and Brighton & Hove have identified a shortfall in housing provision in relation to need, in particular affordable and family sized homes. Supporting the delivery of new housing areas is central to the vision of transforming the harbour into an attractive waterfront community.

Brighton & Hove City Plan Part One (2016)

To meet in full the city’s ‘objectively assessed housing need’ (housing demand and need) over the plan period to 2030 could mean needing to build 1,506 dwellings per annum or 30,120 dwellings to 2030.

There are however very significant constraints on the capacity of the city to physically accommodate this amount of development and this is particularly so in terms of environmental considerations such as the sea to the south and

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1 Objectively Assessed Need for Housing; Brighton & Hove, June 2015, GL Hearn Limited
the South Downs (now a designated National Park) to the west, north and east of the city. With a limited legacy of derelict or vacant sites, these natural boundaries define and limit the outward expansion of the city. The 2005 Housing Needs Survey identified a net annual affordable housing shortfall of 1,200. The City Plan housing target for a minimum of 13,200 new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to make provision in the city for other essential development (for employment, retail, health and education facilities, other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.

5.8 The fact that the city’s housing delivery target does not match the objectively assessed full housing requirement means that there is a ‘duty to cooperate’ with the city’s neighbouring local authorities. Brighton & Hove’s strategic housing market and travel to work area extends westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes and northwards to Mid Sussex, Horsham and Crawley. Many of these areas also face similar challenges in meeting housing requirements. Within Brighton & Hove, the council acknowledges that there is a significant housing shortfall against the objectively assessed housing requirement of 30,120 dwellings to 2030.

In accordance with government guidance, the council will therefore continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.

Adur Local plan 2017

5.9 Housing demand is considered in the fourth Key Issue for the Adur Local Plan 2017:

The need to meet identified housing needs - Adur needs to address a range of housing requirements including the projected increase in smaller households, more family housing and affordable housing.2

5.10 In terms of Adur’s Objectively Assessed Needs the Objectively Assessed Housing Need Update 2015 recommended the delivery of 5820 dwellings over the period (291 dwellings per annum) over the Local Plan period 2011-2031.

2 See Objectively Assessed Need for Housing: Adur District (2015) (GL Hearn) and Objectively Assessed Housing Need Update 2016 (GL Hearn).
5.11 The Objectively Assessed Housing Need Update 2016 (GL Hearn) intended to provide a short update to the August 2015 Report, Objectively Assessed Housing Need: Adur District, and to be read alongside it. The August 2015 Report outlines the context, in respect of national policy and guidance; and provides a chronology of studies which have considered objectively assessed housing needs (OAN) in Adur and the wider Sussex Coast Housing Market Area (HMA).

5.12 This report takes account of the most recent demographic projections and extends the Plan period to 2032. Major Modifications are proposed which revise the OAN figure to 325dpa. In terms of Adur’s Objectively Assessed Needs the study recommends the delivery of 325 dwellings per annum (6,825 dwellings over the Plan period). This represents ‘demand’ for new housing.

6 HOUSING LAND SUPPLY

National Planning Policy Framework

6.1 Paragraph 17 of the NPPF states within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. One of these principles encourages the effective use of previously developed land:

- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

Planning practice guidance: Housing and economic land availability assessment

6.2 Paragraph 035 states local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate.

Shoreham Harbour Joint Area Action Plan

6.3 The Shoreham Harbour Regeneration Area is identified as a broad location for change. To maximise development opportunities, the Shoreham Harbour Regeneration Partnership (jointly with Brighton & Hove City Council, West Sussex County Council, and the Shoreham Port Authority) are preparing a Joint Area Action Plan with proposals to guide development. This is reflected in Policy SH4: Housing and community:
Clause 1 “Sites identified for residential-led redevelopment should contribute a minimum of 1,400 new homes across the harbour area by 2032, comprising 1,100 within Adur and 300 within Brighton & Hove.”

6.4 Both Adur and Brighton & Hove are geographically constrained by the sea and by the South Downs National Park to the north. Most of the remaining green space is protected through environmental designations, to prevent coalescence of settlements and for its recreation and amenity value. As a result, there is a limited supply of sites where new homes can be built and therefore development mainly consists of building on previously developed (brownfield) sites and small scale infill sites. Despite this, the demand for new homes continues to grow creating a challenge for the local authorities in identifying new sites.

6.5 The Joint Area Action Plan will support the regeneration of a number of brownfield sites which have been identified as suitable for residential development, balanced with the protection of key employment sites in other parts of the harbour.

Brighton & Hove City Plan Part One (2016)

6.6 The following table has been adapted from the Brighton & Hove City Plan Part One (2016) to show the land supply for the Shoreham Harbour area. It indicates the components of housing land supply for the period 2010 - 2030. It draws upon the council’s latest Strategic Housing Land Availability Assessment (SHLAA) exercise.\(^3\)

<table>
<thead>
<tr>
<th>Spatial Area</th>
<th>Already Built or Committed</th>
<th>Strategic Allocations</th>
<th>Broad Locations/ Source</th>
<th>Further Capacity Identified in SHLAA</th>
<th>Allowance For windfall</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>DA8</td>
<td>52</td>
<td>-</td>
<td>248</td>
<td>-</td>
<td>-</td>
<td>300</td>
</tr>
</tbody>
</table>

Adur Local Plan 2017

6.7 The first step in developing the housing delivery figure for this plan has been to undertake a Strategic Housing Land Availability Assessment (SHLAA). A SHLAA was produced in 2009, updated in 2012, and a full review was carried out in 2013/14. The SHLAA is monitored annually through the Annual Monitoring Report (AMR). The most recent AMR was published in December 2016 and covers the monitoring period 1st April 2015 – 31st March 2016. The SHLAA identifies all sites which have potential for residential development and determines when they are likely to be developed. It indicates that, on brownfield sites, 254 (net) dwellings could be delivered over the Plan period.

6.8 In addition, the Shoreham Harbour regeneration area, a large brownfield site, has been identified as a broad location for development, and this will deliver a minimum of 1100 additional new homes in the Western Harbour Arm (see

\(^3\) BHCC SHLAA 2014 Update.
Policy 8). Planning consent for 132 of these dwellings has already been granted and this is included in the ‘existing commitments’ figure. In order to avoid double counting the remaining 970 (rounded) dwellings to be provided at this location is shown in Table 1 below which has been adapted from the Adur local plan 2017.

<table>
<thead>
<tr>
<th>Sites to be identified in Local Plan:</th>
<th>Number of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shoreham Harbour Broad Location⁴</td>
<td>970</td>
</tr>
</tbody>
</table>

6.9 Housing supply is further stated in **Policy 3: Housing Provision**

“Over the period 2011 – 2032 a minimum of 3,718 dwellings will be developed in Adur, as follows:

- 1,100 as part of the Shoreham Harbour Regeneration Area Western Harbour Arm

7 **CONSTRAINTS**

**NPPF**

7.1 Landscape issues regarding housing are referenced in a core principle of the NPPF. Paragraph 17 states that planning should take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it. Section 11 of the NPPF is entitled “Conserving and enhancing the natural environment”. This states in paragraph 109 that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils

**Planning Practice Guidance: Housing and economic land availability assessment**

7.2 Paragraph 044 states the framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

⁴ The figure for Shoreham Harbour Broad Location does not include the 132 dwellings which have been granted planning permission and are counted as "Commitments"
Joint Area Action Plan

7.3 Parts of the regeneration area are at a high risk of flooding due to the proximity to the coastline and the River Adur, exacerbated by the low lying topography of some sites. This is especially true for the Western Harbour Arm, parts of Aldrington Basin, Southwick and Portslade beaches as well as the port operational area. The NPPF highlights the need to direct development away from areas at highest risk of flooding (thereby avoiding the risk in the first instance), but where development is necessary, ensuring it will be safe without increasing the risk of flooding elsewhere.

7.4 Several policies in the Joint Area Action Plan contain information regarding housing constraints and flooding:

Policy SH6: Flood risk and sustainable drainage

Clause 1. “Development proposals in the regeneration area must comply with the principles and approach to flood risk management set out in the Shoreham Harbour Flood Risk Management Guide (2015), or subsequent updated guidance. Where development creates new or alters flood flow routes, the site specific Flood Risk Assessment must assess the potential flood hazard posed by them to ensure that flood risk is not increased elsewhere.”

Clause 4. “Residential development proposals must protect against a breach scenario through the application of an appropriate finished floor level of 5.77m AOD.”

7.5 Regarding the Aldrington Basin Character Area, the area priorities highlight flood risk:

“To ensure that all development takes into account the findings and recommendations of current Strategic Flood Risk Assessment and the Shoreham Harbour Flood Risk Management Guide SPD (2015) or subsequent update.”

7.6 Regarding the North Quayside and South Portslade Character Area, the area priorities highlight flood risk

“To ensure that all development takes in to account the findings and recommendations of the current Strategic Flood Risk Assessment and Flood Risk Management Guide SPD (2015).”

7.7 At the Southwick waterfront allocation, the risk associated with tidal flooding increases significantly when sea level rise associated with climate change is factored in. In this scenario, maximum estimated flood depths increase to
about 1.4m with increased flood velocities. Development in this location will need to take this flood risk constraint into consideration.

Paragraph 4.5.16 states The Brighton Marina to River Adur Strategy identifies improvements to flood defence infrastructure in this locality. Improvements will help protect areas identified for development and because no residential development is identified for this allocation, it is considered appropriate that building level resilient and resistant measures will be sufficient.

7.8 Regarding the Western Harbour Arm Character Area, the area priorities highlight flood risk:

“To deliver a comprehensive flood defence solution integrated with a publicly accessible waterfront route including pedestrian / cycle way and facilities for boat users”

This is further reflected in **Policy CA7: Western Harbour Arm**

**Clause 10.** “A setback from the waterfront is safeguarded to enable the delivery of a waterfront pedestrian and cycle route between Shoreham-by-Sea town centre and Kingston Beach. Developments should be sufficiently set back from the riverside (at least 8m from harbour wall to building) to incorporate the new waterfront route. The setback may also be required for flood defence maintenance requirements. Set back distance should be discussed and agreed with the Environment Agency.”

**Clause 14.** “The new waterfront route must incorporate sustainable drainage features, such as permeable surfacing and incorporating suitable trees and vegetation.”

7.9 The Joint Area Action Plan contains policies regarding the provision of green spaces, which may act as a constraint upon housing.

**Policy SH7: Natural environment, biodiversity and green infrastructure**

**Clause 4.** “All development must ensure no net loss, and seek to provide a net gain to biodiversity, in particular to Habitats of Principal Importance (formerly known as BAP habitats). The indirect impacts of development, such as recreational disturbance, on designated nature conservation sites and other significant habitats must be considered. Appropriate mitigation must be identified, along with the means for its delivery and maintenance.”

**Clause 6.** “Development proposals will be required to include schemes to conserve, protect and enhance existing biodiversity and to create appropriate habitats, taking into account appropriate, coastal protected sites and species.”

**Policy SH8: Recreation and leisure**

**Clause 1** “Development proposals will be required to provide high quality multifunctional public open space / green infrastructure on site. The type and quantity of open space will be determined by the scale and type of
development, the identified needs of the area local standards and the
Shoreham Harbour Green Infrastructure Strategy.”

Policy CA2: Aldrington Basin
Clause 10. “Where open space requirements cannot be met on site,
development will be required to contribute towards existing open spaces, such
as Hove Lagoon, Portslade Beach, Wish Park and/or Vale Park.”

Policy CA3: South Portslade and North Quayside
Clause 12 "Where open space requirements cannot be met on site,
development will be required to contribute towards the creation of the
proposed green corridor along the A259, and/or existing open spaces, such
as Vale Park, Hove Lagoon and/or Portslade Beach."

Policy CA7: Western Harbour Arm
Clause 15. “Where open space requirements cannot be met on site,
development will be expected to contribute towards the creation of the
proposed green corridor along the A259, and/or existing open spaces, such
as The Ham and Kingston Beach.”

Brighton & Hove City plan part One (2016)

7.10 The city’s position on the coast and the potential for flooding and coastal
erosion means that homes, buildings and infrastructure require protection
and that the city is adapting well to climate change. In order to help appraise,
manage and reduce flood risk in relation to the location of new development
in the city the council commissioned a Strategic Flood Risk Assessment
(SFRA5), to assess the nature and extent of the flood risk.

7.11 The Brighton & Hove City Plan Part One (2016) contains information
regarding landscaping and greenspace, and possible constraints for
development.

CP16
Clause 1 “The council will require the retention of and seek better, more
effective and appropriate use of all existing open space, as shown on the
policies map, having regard to the Open Space, Sports and Recreation Study
and the Open Space Update Study”

Clause 2 “New development will be required to contribute to the provision of
and improve the quality, quantity, variety and accessibility of public open
space to meet the needs it generates in accordance with the criteria and local
standards set out below”

5 Brighton & Hove Strategic Flood Risk Assessment produced in April 2008, updated in
2011
Future housing growth must be considered within the context of flood risk. Significant parts of Adur are affected by tidal, fluvial and groundwater flooding which acts as a significant constraint to housing growth. Information on flood risk which has been used to develop the spatial strategy is contained in the SFRA and the Flood Risk Topic Paper.

The Adur Local Plan 2017 contains policies regarding the provision of green spaces, which may act as a constraint upon development.

**Policy 30: Green Infrastructure**

“Developments will be required to incorporate elements of green infrastructure into their overall design, and/or enhance the quality of existing Green Infrastructure as appropriate. The Council will work with relevant partners and developers to facilitate the creation of an integrated network of green infrastructure within and beyond Adur. A Green Infrastructure Strategy will be produced by the Council and developments will be expected to comply with this document. All new major developments will need to demonstrate how they will contribute to the implementation of the Green Infrastructure Strategy both at site level and with regard to the wider green infrastructure network.”

**8 HOUSING TARGET**

Previous chapters have demonstrated that there are significant constraints on the capacity of the regeneration area to deliver high levels of housing growth, particularly in terms of its impact on the landscape and areas at risk of tidal and fluvial flooding. The NPPF emphasises positive plan making and the housing supply detailed in the Table below will support the delivery of new housing areas. This is central to the vision of transforming the harbour into an attractive waterfront community.

A target of a minimum of 1400 net additional dwellings over the plan period by 2032 is set out in Policy SH4 clause 1 of the Joint Area Action Plan. This is considered to be the most sustainable, realistic, and achievable housing delivery target for the regeneration area and will be delivered in the following way:

<table>
<thead>
<tr>
<th>Sources of Housing Supply:</th>
<th>Number of dwellings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwellings completed (net)</td>
<td>672⁶</td>
</tr>
</tbody>
</table>

⁶ The Adur District Council Housing Approach Topic Paper 2016 states that 132 dwellings have planning permission and are included as existing commitments. [https://www.adur-worthing.gov.uk/media/media,141985,en.pdf](https://www.adur-worthing.gov.uk/media/media,141985,en.pdf)

The Free Wharf Scheme was approved at the Adur District Council Planning Committee 22.01.2018 and will provide 540 homes.
8.3 The above housing supply delivery targets will contribute to the housing need of both the Adur local Plan 2017 and the Brighton & Hove City Plan Part One (2016). It reflects the vision and objectives and the spatial strategy of Policy 4 of the Joint Area Action Plan and the supporting evidence base by focussing as much growth as possible in the most sustainable locations through the Character Area Policies. It is considered to be deliverable without compromising valued environmental assets and takes into account the need to provide for, and protect other land uses.

9 CONCLUSION

9.1 This paper demonstrates that the regeneration partnership has an up to date, proportionate and robust evidence base and can demonstrate a clear understanding of the housing needs of the regeneration area. It is concluded that, for the Joint Area Action Plan period to 2032 an appropriate overall housing target should be 1400 dwellings.

9.2 The Adur Local Plan 2017 housing delivery target is less than the objectively assessed housing needs of the local plan area. The housing delivery target of the Brighton and Hove City plan Part One (2016) also does not match the objectively assessed full housing requirement. The regeneration partnership has been and continues to be actively engaged with the neighbouring authorities throughout the preparation of this Joint Area Action Plan to contribute towards this housing shortfall.

9.3 The Joint Area Action Plan has sought to maximise housing delivery so far as is consistent with other key strategic policies and development needs of the regeneration area and will significantly increase the supply of housing delivered in the regeneration area over the plan period. It is considered that this approach accords with paragraphs 14 and 47 of the NPPF which sets out the governments planning guidance for achieving sustainable development.

10 DELIVERY
10.1 Delivery of the Joint Area Action Plan has now been considered in a separate and accompanying *Delivery Topic Paper*. This Topic Paper has considered the following elements.

- **Delivery**: The policies of the Joint Area Action Plan, Adur Local Plan 2017, and the Brighton & Hove City Plan Part One (2016) regarding the delivery of development in the regeneration area, and delivery acceleration and funding options from the findings of the *Shoreham Harbour Joint Area Action Plan Whole Plan Viability and Deliverability Study 2018*.


- **Environmental Benefits Delivery**: The policies of the Joint Area Action Plan, Adur Local Plan 2017, and the Brighton & Hove City Plan Part One (2016) regarding the delivery of the district heat network, coastal path and cycle route, and green infrastructure, and the planning applications contributing to the Joint Area Action Plan policy targets.