

## Shoreham Harbour Joint Area Action Plan Examination

### Matters Statement 3: Shoreham Port, economy and employment (Policies SH2, SH3, CA1, CA2, CA3, CA5, CA6, CA7)

***Issue: Whether the Plan has been positively prepared with regard for the activities and requirements of Shoreham Port and justified in respect of the quantitative and qualitative mix of floorspace and land proposed for economic development?***

Please see the Matters Statement Explanatory Note (SHJAAP/MS/EX) for clarification of acronyms, abbreviations and other terms used in this statement.

24. How will the Plan relate to the Shoreham Port Masterplan 2016? Are there any consistencies or conflicts between the two documents? If so, how would they be addressed? Having regard to the Councils' proposed modification MM13, briefly explain how the Plan would enable potential implications for the safety of navigation arising from development proposals to be addressed?

#### ***Councils' response:***

- 24.1 The Shoreham Port Authority (SPA) has been an active partner in the Shoreham Harbour Regeneration Project throughout the preparation of the JAAP. As set out in paragraph 1.12.5 of the Plan, the JAAP includes many of the proposals identified in the Port Masterplan where relevant to the regeneration project. In particular, SPA's proposal to relocate port related uses away from the Western Harbour Arm, and consolidate them in the Eastern Arm and Canal has been one of the main drivers of the regeneration project as a whole.
- 24.2 The Councils and SPA do not consider there to be any inconsistencies or conflicts between these documents. However, the status of the two plans is not the same. As a Local Plan, the JAAP is a statutory planning document, prepared by the Councils according to the Town and Country Planning (Local Planning) (England) Regulations 2012. Development decisions must accord with the Plan, unless material considerations indicate otherwise<sup>1</sup>.

<sup>1</sup> Section 38(6) of the Planning and Compulsory Purchase Act 2004.

- 24.3 In contrast, the Port Masterplan (2010), and Masterplan Review (2016) were prepared by SPA and set out its strategy for growth. They are not statutory planning documents. However they are regarded as material considerations when considering development proposals in the port area - as set out in Policy SH2 (1).
- 24.4 Further, the following JAAP character area priorities reflect the aspirations of the of the Port Masterplan:
- CA1 South Quayside
  - CA3 North Quayside and South Portslade
  - CA5 Fishersgate and Southwick
- 24.5 Proposed Modification MM13, seeks to address an issue which has arisen in relation to pre-application discussions for sites WH1 and WH2. These sites are close to the entrance to the port, at the mouth of the River Adur. Shipping entering the harbour relies on a series of navigational lights in order to negotiate the entrance to the harbour. There is a risk that lighting from new development could interfere with the visibility of these navigational lights, creating a safety issue and undermining the operations of the port. This is acknowledged in the background text to the Plan, at paragraph 4.7.68. However, this was not reflected in Policy CA7. ADC and SPA have engaged with the relevant developers on this matter and will continue to do so. However, the Councils consider that to be positively prepared and effective, the modification to the policy is necessary.

25. What is the current status of the emerging West Sussex Joint Minerals Plan? Would the Plan adequately safeguard minerals wharves within the Plan area?

**Councils' response:**

- 25.1 West Sussex County Council and the South Downs National Park Authority formally adopted the West Sussex Joint Minerals Local Plan on 20 July 2018. The plan includes the following wording in paragraph 6.10.11:

*"The wharves within Shoreham Port include two located in the Western Harbour Arm, which are within an area subject to plans for regeneration, as set out in the Shoreham Harbour Joint Area Action Plan. In 2016 these wharves have temporary permission and this Plan allows for their redevelopment for non-minerals use as part of the regeneration proposals. These wharves are safeguarded whilst they have planning permission, and further permissions may be granted for further mineral related development at these sites if there is not a conflict with other development plan policies and objectives. These temporary permissions can contribute positively to ensuring a steady and adequate supply of minerals to the area."*

- 25.2 The West Sussex Joint Minerals Local Plan 2018 Policy M10 clause (c) safeguards the permanent wharves of Shoreham Harbour, also seen in Policies map 2. Policy M10 clause (e) highlights the two temporary wharves that will be safeguarded, also seen in Policies Map 3, which are the two temporary wharves of the Western Harbour Arm. New Wharf has temporary permission for unloading, preparation and storage of aggregates until September 2020. Kingston Wharf is no longer in use as a minerals wharf, and the temporary permission on this site expires in October 2018. Safeguarding of these sites will cease once permission expires.
- 25.3 Owing to the above, the Joint Area Action Plan is consistent with the Waste and Minerals Plan 2013 and the West Sussex Joint Minerals Local Plan 2018. In order to reflect the adoption of the West Sussex Joint Minerals Local Plan 2018, the Councils propose that further minor modifications are made to the Plan.

The proposed minor modification below, supersedes MIN21:

~~1.11.10 The West Sussex Minerals Local Plan (2003) safeguards a number of wharves at Shoreham Harbour, including some sites proposed for new mixed use development in this plan. The Submission Draft West Sussex Joint Minerals Local Plan (2017~~8~~) seeks to safeguard~~ sufficient capacity to ensure a steady and adequate supply of minerals whilst supporting regeneration aspirations set out in this document. The plan **was adopted in July 2018**. ~~has been submitted to government for examination on legal compliance and soundness.~~

3.2.17 Policy M10 of the ~~Submission Draft~~ West Sussex Joint Minerals Local Plan (2017~~8~~) safeguards permanent mineral wharves at Shoreham Port for the purpose of minerals transportation. The policy further safeguards temporary consents granted at New Wharf and Kingston Wharf, to ensure they can continue to operate without prejudice, whilst they have planning permission. The plan states (paragraph 6.10.11) further temporary permissions may be granted for mineral related development at these sites if there is not a conflict with other development plan policies and objectives. These temporary permissions can contribute positively to ensuring a steady and adequate supply of minerals to the area. **Safeguarding of these sites will cease once permission expires**

26. Would the total area of employment land proposed to be allocated reflect the requirement for the area identified in the ALP and the B&HCLP(1)?  
Are the boundaries of the proposed employment areas justified?

**Councils' response:**

- 26.1 Yes. The total area of employment land proposed to be allocated in the Plan reflects the requirements for the area identified in the ALP and the B&HCLP(1). The response to Question 7 also addresses consistency between the Plan and the ALP and B&HCP(1).
- 26.2 The Shoreham Harbour Regeneration Area is identified as a broad location for change in both the ALP and B&HCP(1). The ALP proposes 16,000m<sup>2</sup> employment generating floorspace within the part of the regeneration area in Adur; the B&HCP(1) proposes 7,500m<sup>2</sup> employment generating floorspace within the part of the regeneration area in Brighton & Hove. These requirements are reflected in Policy SH3(1) of the Plan.
- 26.3 Policies CA2, CA3, CA5 and CA7 disaggregate the proposed employment space to the respective allocations. The Councils consider that the boundaries of the proposed employment areas are justified. These have been determined through an iterative process. The Shoreham Port Masterplan (LPD04/08) and Shoreham Harbour Capacity and Viability Study (CD10/02) identified a number of sites as suitable for redevelopment. These have been explored through the Shoreham Harbour Development Briefs (LPD04/03 and LPD04/04) and earlier iterations of the JAAP (ECD01/01 and ECD02/01). The site selection process is addressed in response to Question 28.

27. Does the Plan reflect a clear understanding of business needs within the area and the likely changes in the market? Will the land and floorspace proposed be sufficient, suitable and available to meet the identified existing and future needs for all foreseeable types of economic activity over the plan period? How will the Plan policies provide sufficient flexibility to respond to future changes? How would any shortfall be addressed?

**Councils' response:**

The Sub-Regional Perspective:

- 27.1 Yes. The JAAP reflects a clear understanding of the role of Shoreham Harbour to the economies of Brighton & Hove, Adur and the wider sub-region. The Plan is based on clear economic strategies [Brighton & Hove Economic Strategy 2008-2016 (LPD02/21); West Sussex Economic Strategy (LPD03/09); Coast to Capital Strategic Economic Plan (RPD01/04)] which positively encourage sustainable economic growth in accordance with the paragraph 21 of the NPPF 2012<sup>2</sup>.

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<sup>2</sup> Paragraph 81 of the NPPF 2018.

- 27.2 The Shoreham Harbour Regeneration Area is identified as a strategic location for growth. This is also reflected in the Coastal West Sussex and Greater Brighton Local Strategic Statement (RPD01/01). The regeneration of Shoreham Harbour and surrounding areas is a long standing aspiration of all the project partners with the long term strategy to revitalise the area and deliver modern employment floorspace.
- 27.3 Shoreham Harbour has been identified as a growth centre which will focus on environmentally driven technologies [Greater Brighton City Deal, Policy CP2: Planning for Sustainable Economic Development in the B&HCP(1)]. The Greater Brighton City Deal includes a commitment to invest in flood defences to support delivery of new employment space at Shoreham Harbour and Airport.
- 27.4 The Local Strategic Statement (LSS2) (RPD01/01) includes: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham. This states that the local planning authorities will work with their partners to support the development of the strategic employment and housing sites, including Brighton Airport, Shoreham and Shoreham Harbour, identified in the ALP and B&HCP(1) by giving priority to the infrastructure improvements needed to enable the sites to be delivered.

#### Shoreham Port

- 27.5 Shoreham Port is the largest commercial port between Southampton and Dover and the closest Channel Port to London. The Shoreham Port Masterplan sets out the Shoreham Port Authority's strategy for growth and development of the port. The regeneration proposals in the Plan provide an opportunity to support the Masterplan through consolidation, reconfiguration and enhancement of Shoreham Port operations and this is reflected in Policy SH2 Shoreham Port.

#### The Brighton and Hove Economy

- 27.6 The Plan policies reflect that the city of Brighton & Hove is expected to continue to function as an economic growth hub for the wider sub-region where there is a shared ambition to improve the sub-region's prosperity and employment rate.

- 27.7 The B&HCP(1) and ALP addressed the needs of all employment-generating sectors of the economy and are long-term plans supporting the forecast business and job growth to be realised over the plan period [Brighton & Hove Employment Land Study Review 2012 (SED03/02) and Adur Employment Land Study (SED03/01)]. The Plan therefore seeks to ensure that that suitable employment land and premises are safeguarded and upgraded and new employment floorspace is created to contribute to meeting forecast needs. The employment land allocations set out in the Plan accord with adopted Policies DA8 Shoreham Harbour (B&HCP (1)) for 7,500m<sup>2</sup> net additional employment floorspace and ALP Policy 4 (Planning for Economic Growth) which allocated 16,000m<sup>2</sup> floorspace in the part of the Shoreham Harbour Regeneration Area within Adur.
- 27.8 The B&HCP (1) acknowledges that not all the employment space needs have been met through allocations (See Table 5, page 140 - where a shortage of c.34,000m<sup>2</sup> of industrial floorspace and c.21,000m<sup>2</sup> of office floorspace is acknowledged). B&HCP (1) Policy CP3.6 indicates that Part Two of the City Plan will seek to address any unmet need through further allocations. This is also recognised as ongoing duty to cooperate matter. The Plan policies also reflect an understanding of the types of spaces required to encourage indigenous business growth within the city and investment in identified growth sectors.

### The Adur Economy

- 27.9 Relative to the wider sub-region and the South East as a whole, a high proportion of commercial floorspace in Adur is industrial. Adur does not currently have a particularly well-developed office market, influenced partly by its proximity to Brighton which is an established office centre. Although the manufacturing sector in Adur has been performing relatively well, traditional manufacturing across the region has generally been in decline in recent years and this trend is set to continue. Therefore, it is important that a range of employment land and premises are provided in Adur to help strengthen the economy.
- 27.10 The economic development policy objectives of Adur & Worthing Councils are aimed at encouraging higher quality jobs in the area within the creative, digital and IT sectors; advanced engineering; environmental technologies and low carbon and environmental goods and services; Finance and business services; and Healthcare, medical technologies and life sciences. The growth of these sectors of the economy will require provision of high quality B1 office and light industrial accommodation in attractive, accessible locations, close to facilities. Shoreham Town Centre, Western Harbour Arm and Shoreham Airport provide opportunities for the development of this type of accommodation to meet these needs.

27.11 The ALP also acknowledges that it is unlikely that the allocated sites and other key existing employment areas will meet the full projected demand for new employment floorspace in Adur. As a result, the Council is working with neighbouring authorities to help meet the employment needs of the area under the Duty to Co-operate.

### The JAAP

27.12 The approach through Policies CA1, CA2, CA3, CA5, CA6, CA7 has been to distinguish between those sites strategic employment areas that are identified and protected for B1, B2 and B8 uses and those employment sites that are identified as suitable for mixed use redevelopment. Site selection is addressed in response to Question 28.

27.13 It is considered that taken together with the B&HCP(1) and the ALP, the Plan Policies SH2, SH3, CA1, CA2, CA3, CA5, CA6, CA7 provide an appropriately flexible and responsive policy framework related to the objectively assessed needs for B Use Class employment floorspace over the plan period to ensure that the economies of Brighton & Hove and Adur, and their future potential, are not constrained by a lack of employment sites.

### Conclusion

27.14 To summarise, the approach taken to provision of employment space in the regeneration area by the JAAP, ALP and B&HCP is:

- Allocating several sites for new employment floorspace development). Site selection is addressed in response to Question 28.
- Allocating sites for new mixed use development (residential and employment floorspace. Site selection is addressed in response to Question 28.
- Protecting existing employment sites (see Policy 25 of the ALP and Policy CP3 of the B&HCP(1). This is addressed further in response to Question 29.
- Providing additional floorspace through redevelopment, renovation, intensification, change of use to employment, and provision of new employment sites.

- 27.15 This approach is considered positive, and in accordance with the NPPF, but is also realistic in reflecting the limited capacity to accommodate new development without significant environmental impacts. Given that much of the proposed development at Shoreham Harbour will be residential, compatible employment i.e. B1 and appropriate A1 uses, will constitute the majority of new employment generating uses delivered at the Harbour. This creates an opportunity to expand Adur's underdeveloped office market through the provision of new office accommodation and thus supporting growth in higher value-added sectors in the regeneration area. This location also provides the potential to support growth in key sector strengths including the digital technologies, IT and communications, creative/ cultural and professional services sectors.
- 27.16 Due to the constrained nature of the local planning authority areas, due to their location between the sea and the South Downs National Park; and the need to meet objectively assessed housing needs as far as is possible, there is not a significant amount of land available to meet projected employment needs over the ALP, B&HCP(1) and JAAP plan periods. Managing the competing pressures for other uses to ensure delivery of employment floorspace is essential. The Councils are working to facilitate the release of certain sites for redevelopment. This is addressed in response to Question 54.

28. What methodology has been used for site selection and are the criteria clear, robust and justified?

***Councils' response:***

- 28.1 The Plan includes four allocations for new employment generating floorspace and mixed use development; each comprised of several individual sites:
- Aldrington Basin (within Character Area 2)
  - South Portslade (within Character Area 3)
  - Southwick Waterfront (within Character Area 5)
  - Western Harbour Arm Waterfront (within Character Area 7)
- 28.2 Site selection has been an iterative process. The proposed allocations have been identified through the following documents:

### Shoreham Port Masterplan:

- 28.3 The Department for Transport recommends that major ports should produce a masterplan<sup>3</sup>. SPA published the Shoreham Port Masterplan (2010) (LPD04/08) in 2008. This is not a statutory planning policy document. However it is a material consideration when considering proposals in and near to the regeneration area.
- 28.4 The Masterplan identified the Eastern Harbour Arm and Canal as the focus for future commercial port activity. Due to the significant reduction in port operations at the Western Harbour Arm, the Masterplan proposed that remaining port uses in the Western Harbour Arm be relocated and land released for other developments.
- 28.5 The Masterplan earmarked the Western Harbour Arm for significant change and the redevelopment of land for substantial new residential and employment uses. In relation to SPA owned sites, it identified the redevelopment potential for:
- Kingston Wharf (including Kingston Railway Wharf). This is allocated as site WH2 in the Plan. This was fully owned by SPA. It is now owned by Hyde New Build Ltd.
  - Free Wharf. This is allocated as site WH5 in the Plan. This was partially owned by SPA. It is now owned by Southern Housing Group.
- 28.6 The Shoreham Port Masterplan Review (2017) (LPD04/07) reported that capital receipts from the release of the sites at the Western Harbour Arm have enabled the purchase of land in the Eastern Arm and Canal, for employment and port operational uses.
- 28.7 The Masterplan Proposals map includes proposed employment use as Southwick Waterfront and Aldrington Basin (sites AB1 to AB3); and mixed residential and employment uses at The Western Harbour Arm Waterfront (allocated as sites WH1 to WH7) and Aldrington Basin (site AB4); and employment. The South Portslade allocation is outside the Masterplan area and is therefore not included.

### Shoreham Harbour Capacity and Viability Study (2011) (CD10/02):

- 28.8 Shoreham Harbour Regeneration Partnership was awarded funding under the second wave of the government's Eco-Towns programme in 2009 and a Capacity and Viability Study (2010) (CD10/02) was commissioned to explore its potential to meet the programme criteria. The study identified parts of Aldrington Basin, South Portslade and the Western Harbour Arm as suitable for high-density mixed-use development.

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<sup>3</sup> *Guidance on the Preparation of Port Master Plans* (Department for Transport: 2008)

28.9 The study tested two scenarios: the 'Eco option', based on the Eco-town criteria; and the Quantum option based on a 'business as usual' approach. A partial realignment of Brighton Road (A259) at the Western Harbour Arm was also considered against retaining the existing road. These identified a range of potential employment space capacities, as set out in the table below:

	Eco option		Quantum option	
	A259 realigned	A259 retained	A259 realigned	A259 retained
Aldrington Basin	22,189	22,189	25,517	25,517
South Portslade	39,809	39,809	45,780	45,780
Western Harbour Arm	51,689	26,146	39,339	59,163
<b>Total</b>	<b>1,408</b>	<b>1,150</b>	<b>39,339</b>	<b>1,621</b>

Table 1: Potential employment capacity(m<sup>2</sup>) identified in the Capacity and Viability Study (2010)

28.10 It should be noted that the indicative study area for the Capacity and Viability Study was larger than the Shoreham Harbour Regeneration Area. The study considered sites now outside the regeneration area, such as the former Adur Civic Centre. It also assumed the complete redevelopment of these three character areas. The employment floorspace figures are therefore higher than those proposed in the Plan.

28.11 The study assumed that a large number of dwellings could be accommodated on waterfront sites at Aldrington Basin. However this would be contrary to the Shoreham Port Masterplan (2010). The incompatibility of residential and port uses would have had serious consequences for the operations of the port. These sites are therefore allocated for employment uses that will be compatible with their location.

28.12 The study further assumed it would be feasible to realign Brighton Road (A259). Whilst this would have provided a larger land area suitable for redevelopment at the Western Harbour Arm, this would have required significant public sector investment for land acquisition and construction. This option has not been progressed.

## Shoreham Harbour Development Briefs (LPD04/03, LPD04/04):

- 28.13 The Capacity and Viability Study recommended that clear planning policy for the harbour was essential, including interim guidance. In order to further explore the capacity for development, refine the site selection, and provide policy guidance in advance of the JAAP, Shoreham Harbour Regeneration Partnership commissioned development briefs for the Western Harbour Arm, and South Portslade and Aldrington Basin. The Sustainability Appraisal of the Plan (CSD04/10) and Appendix XX to Matters Statement 2 (MS-02) sets out the different options that were considered during the preparation of the development briefs.
- 28.14 Extensive engagement was carried out by the Councils during the production of the development briefs. This included workshops and exhibitions for stakeholders, including community and residents groups, businesses and landowners.
- 28.15 Individual sites were considered in greater detail than for the Capacity and Viability Study. This led to a number of sites being considered unsuitable for residential development. These include
- Sites AB1 to AB3. These sites are within the port area and adjacent to the main turning area for shipping. Due to noise issues and the potential impacts on the operations of the port, these sites are allocated for employment.
  - Site SP6 (front): This site is opposite an active safeguarded minerals wharf. It is also at the junction of Church Road and Wellington Road (A259). This site was therefore removed due to noise and air quality issues, and the potential impact on a safeguarded use.
  - Existing employment floorspace at South Portslade Industrial Estate and Aldrington Basin is protected (see response to Question 29)
  - Sites to the north of Brighton Road (A259) at the Western Harbour Arm are not allocated. These sites are currently occupied by operating businesses.

## Sustainability Appraisal

- 28.16 The recent stages of Sustainability Appraisal (CSD04/01, ECD01/02 and ECD02/02) have all included an assessment of the Character Area policies, which includes consideration of any site specific constraints where relevant to the allocations and Character Areas. Appendix A to Matters Statement 1B sets out all the options that have been considered throughout the preparation of the JAAP, the ALP, the B&HCP(1) and the Shoreham Harbour Development Briefs.

## Conclusion

28.17 The sites proposed for development within the allocations in the plan are the result of an extensive process of site selection. The Councils consider that the methodology described above has been clear, robust and justified.

29. The Plan identifies a need for the protection of certain employment sites, in Policies CA2(5) and CA3(5). How is it proposed to secure this protection, having regard to changes of use potentially permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015?

### ***Councils' response:***

- 29.1 Policies CA2(5) and CA3(5) of the Plan reflect the B&HCP (1) and accord with NPPF paragraph 22 in that the protection of the employment sites was based on the 2012 Employment Land Review Study which considered the need for employment land over the plan period. The findings of the study indicated there were reasonable prospects for sites being used for the purposes set out in the policies.
- 29.2 However it is recognised that the government in October 2015 made permanent the temporary permitted development rights B1a (offices) to C3 (dwellinghouses) which was due to expire in April 2016. Additional matters for prior approval were made in April 2016 through amendments to the 2015 GDPO notably the requirements to assess the impacts of noise from commercial premises on the intended occupiers of the development.
- 29.3 Therefore with respect to Policy CA2 (5) – The protected employment sites are the SPA-owned Hove Enterprise Centre and Maritime House. it is considered that the noise impact of port-related uses would be a sufficient issue to secure protection of the port-side sites. Furthermore, SPA is one of the regeneration partners, this will secure their protection over the plan period. Indeed, it purchased Maritime House specifically to prevent a conversion to residential dwellings, which would have had a serious detrimental effect on the operation of the port.
- 29.4 Regarding the protected employment space of CA3(5), paragraph 4.3.1 states land uses on the south side of the A259 are predominantly port-related, industrial and aggregate uses including the safeguarded Britannia Wharf. Paragraph 4.3.26 also states North Quayside will remain safeguarded for port-related operational uses as part of the consolidation of port activities. The adverse noise of port and industrial uses would impact upon amenity, and would not render a change from employment use sustainable. Owing to this, prior approvals can be refused on this basis to secure the protection of the employment sites.

- 29.5 With regard to Policy CA3 (5) - South Portslade Industrial Estate is defined predominantly by employment generating uses, this includes car garages, offices and product fabrication. The Plan policy accords with Policy DA8 Shoreham Harbour and CP3 Employment Land in B&HCP (1). It should be noted that the area protected for employment has been altered in extent from the 2005 Brighton & Hove Local Plan designation in light of the opportunities for mixed use redevelopment at the south-eastern portion of the industrial estate as indicated in Policy CA3(4) which emerged through the preparation of the Plan and was informed by the South Portslade Industrial Estate and Aldrington Basin Development Brief.
- 29.6 It is recognised that temporary permitted development rights apply to B8 (storage distribution) under 500m<sup>2</sup> being allowed to change to residential. This is subject to a number of criteria being met and subject to Prior Approval being sought with respect of air quality transport and highways impacts, contamination risks, flooding risks, noise impact and impact on the sustainability of adjoining uses. It is also recognised that temporary permitted development rights apply allowing a change of use from B1 c (light industrial) to C3 (dwellinghouses) but this is also subject to limitations and conditions. The Councils can refuse an application for Prior Approval if it would undermine sustainable future employment; though acknowledge the right of appeal against such a refusal.
- 29.7 Further, the Councils acknowledge that Class B2 General Industrial premises can only convert to light industry and storage (GPDO Class I) and therefore are not lost from employment use.
- 29.8 It is considered that these limitations and conditions will help to protect South Portslade Industrial Estate with some businesses understood to be in sui generis use (B&H Employment Land Study Review 2012). However the local planning authority monitors the impact of permitted development rights through its authority monitoring report and if deemed necessary will seek to introduce an Article 4 Direction to remove permitted developments rights.

30. What mechanisms are proposed to secure training and job opportunities for local residents through development proposals? If the use of planning obligations is envisaged, are the Councils satisfied that these would meet the requirements of regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010?

### **Councils' response:**

30.1 Both ADC and Brighton & Hove recognise the opportunity that new development presents to provide employment and training opportunities to local people. Each council has its own process for addressing this.

#### Adur

30.2 The Councils worked with the Coastal West Sussex Partnership to produce the Business and Developer Charter (June 2013) (LPD01/13) to maximise the economic and employment benefits from new developments. The Charter has been circulated to major developers and has helped to secure s106 agreements to ensure the use of local labour, local contractors and to ensure developers employ apprentices.

30.3 Examples of successful developments include the new Brighton and Hove Albion First Team and Training ground at Lancing where the s106 agreement required:

*"2.2 To use reasonable endeavours to:*

*2.2.1 secure that 50% of the construction workers employed to work at the development during the Construction Phase are recruited from the local population living within a 7 mile radius of the Land;*

*2.2.2 secure that 50% of the new employment opportunities at the Development are offered to suitably qualified members of the local population living within a 7 mile radius of the Land; and*

*2.2.3 secure that 50% of the training opportunities at the Development are offered to suitable qualified members of the local population living within a 7 mile radius of the Land;*

*And for the avoidance of doubt reasonable endeavours shall include:*

*(a) notifying Job Centre Plus or any other subsequent organisation of all vacancies for employees, self-employed, sub-contractors and any other form or type of employment or service arising from the Development;*

*(b) supplying to the manager at Job Centre Plus a full and detailed labour plan for the full duration of the Construction Phase identifying what skills, employment and services are needed for the Development throughout the Construction Phase;*

*(c) providing the Council's Executive Head of Planning, Regeneration and Wellbeing with the Labour Return every month during the Construction Phase and with an annual report of the progress in meeting the target for training opportunities."*

- 30.4 The monitoring of this agreement revealed that all targets were exceeded and the £30 million development secured during construction the use of local labour and construction companies and since opening employed locally and continues to promote apprenticeships opportunities for grounds and maintenance staff as well as coaching staff. Current negotiations on the strategic allocation at New Monks Farm will also ensure that similar provisions are incorporated into the s106 legal agreement.
- 30.5 The Council will use such mechanisms for sites within the Shoreham Harbour Regeneration Area to ensure that the economic impacts of new development provide employment and training opportunities to local people.

#### Brighton & Hove

- 30.6 Policy CP7 Infrastructure and Developer Contributions in the B&HCP(1) sets out the range of planning obligations that may be sought from new development. These include securing contributions to employment and regeneration initiatives including securing local employment, training and apprenticeships to include young people who are not in employment, education and training (NEET). The policy requirements accord with the Community and Infrastructure Regulations 2010.
- 30.7 Developers will be required to demonstrate, by means of an Employment & Training Strategy, how they will provide opportunities for local people, wishing to enter or return to the construction industry. Apprenticeships, work experience and training will be negotiated at the outset and during the life of the project.
- 30.8 Where there are developer contributions attached to a project, main contactors or sub-contractors can negotiate short duration bespoke training in respect of skills shortages on site which in some instances can help to overcome potential delays on the project.
- 30.9 The developer contributions will not only provide opportunities for new entrants to the industry but also upskill the existing contractor workforce, enabling them to enhance their skills, their income and broaden their opportunities.
- 30.10 Further guidance is set out in the council's adopted 'Developer Contributions Technical Guidance' (updated March 2017) (LPD02/19).