Shoreham Harbour Joint Area Action Plan

Representations to Revised Draft Version
(Consultation Period : Dec 2016-Feb 2017)

TRANSPORT

[redacted] 17 December 2016 at 12:00

To: consultation@shorehamharbour.com

Thank you for contacting me via email asking for my views regarding Shoreham redevelopment.

I have concern that with too much development, Shoreham may turn into a mini Brighton and Hove. However I remain positive about improving Shoreham and some development.

My main worry is that of transport. Even as Shoreham is now, the town is clogged with traffic queuing back towards Worthing over the Norfolk bridge and just as bad from the Brighton direction. This congestion is pretty much constant through out any day. HGV wise (and car wise) coming down from the A27, The Red Lion, Swiss Cottage to the Bridge roundabout is already a nightmare.

Simply put, Shoreham's existing roads cannot cope with the volume of traffic now before any redevelopment and the subsequent housing ear-marked for the area. So what new roads and or road widening etc are being considered to ease the situation now and for the future? None is my gut feeling!

Just as an aside . . . with building so many new houses in and around Shoreham every planner knows that a basic infrastructure needs to be in place i.e. police doctors and health centres recreation etc. I still cannot get my head around knocking down a hospital (Southlands) to build more houses to accommodate more people who will possibly in turn be needing a hospital!!!!!

Thank you for your time in reading my email.

[redacted]

[Adur & Worthing Councils] Website email enquiry [redacted]

webmaster@adur-worthing.gov.uk <webmaster@adur-worthing.gov.uk> 17 December 2016 at 09:26

[redacted]

To: info@shorehamharbour.com

[redacted]

Hello. I am a resident at [redacted] and I had some questions about the proposed retail and residential opportunities in the plan for this area.

What sort of retail sites would be located in the area? We currently have an iron works and a car breakers - would these be moved out of the area?

What sort of guarantees can you make to existing residents about parking? Parking is already a nightmare during the week with the school, businesses and people from all over coming to park on ours and the surrounding roads during business hours, making it difficult for residents to park. I can't help but feel the introduction of more businesses and homes would make this worse. Would there be plans for parking for these people or a permit parking scheme for residents?

Is there somewhere we can come and see the plans? Are they still in the same stage they are online or are there more detailed drawings or renderings of what you're trying to do?

Thanks

[redacted]

Please reply to this email.

Thank you.

Comments on the revised draft of the Shoreham Harbour Joint AAP

Edward Sheath <Edward.Sheath@eastsussex.gov.uk> 4 January 2017 at 15:56

[redacted]

FAO Chris Jones,

Consultation on the revised draft Shoreham Harbour Joint Area Action Plan

Thank you for consulting East Sussex County Council (ESCC) on the draft Shoreham Harbour JAAP. As you will be aware, ESCC is party to the Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority (August 2016), and considers that this is an effective way to ensure that minerals wharf capacity is safeguarded at Shoreham Port. Therefore, ESCC has no objections in principle to the draft JAAP.

The Waste and Minerals Plans produced by the Mineral Planning Authorities covering the Port area are the principal vehicles for safeguarding wharfage. However, it is important to make sure that these documents link with the JAAP to ensure consideration of future development proposals takes account of any impact on wharf capacity. We would therefore request that the following amendments (new red and underlined, delete ~~strikeout~~) are made to the JAAP to ensure that the document properly cross references to our Plans:

Page 35 - 3.2.15 "Policy WMP 15 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals ~~Local~~ Plan (2013) safeguards existing, planned and potential minerals wharf facilities and their consequential capacity for receiving and processing sea-borne imported aggregates at the Shoreham Port. The policy does allow for some redevelopment of wharves if overall capacity is maintained at the harbour. It is recognised that this capacity could be in the West Sussex portion of the harbour. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan identifies the area of Port falling within Brighton & Hove for safeguarding where policy WMP15 will apply."

Page 35 - 3.2.16 "East Sussex County Council, the South Downs National Park Authority and Brighton & Hove City Council annually ~~are currently~~ update~~ing~~ their Local Aggregates Assessment (LAA) which investigates the demand for and supply of aggregates in the minerals planning authorities' area. ~~Early~~ The LAA indicates ~~are~~ that the consumption ~~use~~ of marine-won aggregates in the area is now greater than in previous years. ~~previously thought~~. The implication is that maintaining sufficient wharf capacity at Shoreham Harbour will be important in order to maintain the supply of aggregates."

Page 36- 3.2.21 "The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (~~2012~~ 2013) ……."

Page 55 - 3.7.33 "Brighton & Hove City Council, East Sussex County Council and the South Downs National Park Authority~~,~~ have adopted a Waste and Minerals Plan (2013) that provides planning policies to guide the management of waste and production of minerals over the plan period to 2026. In addition, the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan identifies areas of safeguarding for current and future waste management capacity. This includes areas at Shoreham Port."

Page 73 After 4.2.4 Insert "The Aldrington basin area includes Ferry Wharf a disused minerals wharf. If proposals for development come forward for this site then policies for re-provision of wharf capacity will apply".

I hope that these suggested changes are able to be incorporated into the Proposed Submission version of the Joint AAP. Should you wish to discuss any part of our representation then please do not hesitate to contact us.

Kind Regards,

Ed

Edward Sheath

Head of Service – Planning and Environment

East Sussex County Council

W1C, C Floor, West Block, County Hall, St Anne's Crescent, Lewes, East Sussex, BN7 1UE

[redacted]

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[redacted]

Williams, Nick (NE) <Nick.Williams@naturalengland.org.uk> 9 January 2017 at 14:10
To: "consultation@shorehamharbour.com" <consultation@shorehamharbour.com>

Hello,

Thank you for the opportunity to comment on this plan. We have no specific detailed advice however would like to say that we support the policy **SH7: Natural environment, biodiversity and green infrastructure**.

If we have missed anything or you would like further advice – do contact us.

Many thanks,

Nick Williams
Natural England **|** Lead Adviser
Sustainable Development **|** Planning
Area 14 **|** Sussex and Kent
Postcode: BN11 1LD
[redacted]

Natural England offers two chargeable services – The Discretionary Advice Service (DAS) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (PSS) provides advice for protected species mitigation licence applications.

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[redacted]

[redacted]

---------- Forwarded message ----------
[redacted]
Date: 27 January 2017 at 14:49
Subject: JAAP
[redacted]

Dear Chris

Our Board has now considered the latest draft of the JAAP and strongly support it, noting however it is still work in progress and may still change again before it's finally published later this year.

There were a couple of comments:

1. We have revised the Port Masterplan – please see a copy attached for your information – comments welcomed. There is one change that we would like incorporated in the JAAP this being the straightening of Basin Road South at the eastern end. This means slight amendments to Maps 4, 6, 7 & 9 and revised wording on Page 62 would be appreciated. I think all the other changes to the Masterplan are already covered in the JAAP unless you spot something I've missed.

2. There is no mention as far as I can see about improving the sea defences needed along the Southwick and Portslade Beaches in 3.4 or for that matter at the locks in 3.1, although I appreciate there is some mention of flood management later on Pages 126 & 127. Considerable work has been undertaken by SPA and the local authorities at the beaches, but more is needed, which could possibly be linked to other objectives such as improving access to the beaches and a safer route along Basin Road South for cyclists/pedestrians.

Many thanks

Peter

Peter Davies
Development Director

Shoreham Port

[redacted]

Email Disclaimer

[redacted]

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[redacted]

Surfing and the proposals

[redacted] 29 January 2017 at 21:15

To: "consultation@shorehamharbour.com" <consultation@shorehamharbour.com>

Hello,

I just want to make the following points re the proposals:

- I welcome the recognition of Southwick beach for surfing and other watersports, but in actual fact surfing takes place at other locations as well (e.g. in the Harbour Arms)
- Plan Objective 8 and policy SH8 should protect and enhance surfing throughout in the Port area
- I support policy SH7.1 to improve water quality in the Port area.

[redacted]

Shoreham Harbour Regeneration

[redacted] 30 January 2017 at 11:48

To: consultation@shorehamharbour.com

To Whom It May Concern,

Comments regarding the redevelopment of Shoreham Harbour from [redacted]

As a resident with a family in South Portslade I am very pleased to hear that plans to redevelop Shoreham Harbour and Aldrington Basin are being made. Currently the area suffers from being neglected and the industry in the area has a negative impact on the local area.

The main points that come to my mind are the following

• Improvements to access of the seafront and updated infrastructure to improve leisure, especially cycling routes around Portslade to the seafront area and Basin Rd would be significantly beneficial for local people.

• The current feel of the areas traffic is one of danger and any steps that can improve the safety along Trafalgar Rd / Basin Rd and around the Harbour and Aldrington Basin would be hugely beneficial to local families.

• Any plans that will reduce the amount of Heavy Good Vehicles using the local roads such as Trafalgar Rd would be extremely positive to the environment and I am interested to hear about what the plans are for the many plants and industrial units that use the area.

• Any residential development would require more facilities such as doctors, dentists, schools and nurseries of which there are limited resources so I am interested to here of how the plans consider this.

Generally I think that Shoreham Harbour and Aldington Basin have a huge amount of potential to offer improved living standards of residents of Portslade and Shoreham and I am enthusiastic about the plans.

Regards

[redacted]

Shoreham harbour consultation

[redacted] 30 January 2017 at 14:57

To: consultation <consultation@shorehamharbour.com>
Cc: sasinbrighton <sasinbrighton@gmail.com>

Dear Sir/Madam,

I welcome the recognition of Southwick beach for surfing and other watersports, but in actual fact surfing takes place at other locations as well (e.g. in the Harbour Arms)

Plan Objective 8 and policy SH8 should protect and enhance surfing throughout in the Port area

I support policy SH7.1 to improve water quality in the Port area.

I use the area throughout the year to surf.

[redacted]

Shoreham Harbour Joint Area Action Plan Revised Draft for Consultation December 2016

Consultation Response

[redacted]

Address: Organisation: Sussex Yacht Club

85-89 Brighton Road

Shoreham - by –Sea

West Sussex

BN43 6RF

[redacted]

COMMENT ON: MAP 4, PAGE 23

The notation on Map 4 Regeneration Proposals (page 23) shows the line of "new/upgraded flood defences (proposed)" across the land at Shoreham belonging to the Sussex Yacht Club. This is now out of date and should be updated to show the new alignment recently agreed in principle with Adur District Council and The Environment Agency.

The maps in the 2014 version of the JAAP and the 2015 Shoreham Harbour Flood Risk Management Guide SPD both show a line for flood defences going through the Sussex Yacht Club's boatyard and moorings. This notation has been carried forward to the Regeneration Proposals Map 4 in the 2016 consultation draft JAAP.

However in 2016 the Club, Adur District Council and the Environment Agency established that the construction of a flood wall through the boatyard and moorings would be incompatible with the continued operation of the boatyard, moorings and the Club's associated wide variety of boating activities. Instead proposals are now being drawn up for building the flood defence wall alongside Brighton Road (A259) and the consequent relocation of the Clubhouse within the boatyard.

Therefore Map 4 should be amended accordingly to show the line of the "new/upgraded flood defences (proposed)" running alongside Brighton Road (A259).

Comments on the plan

[redacted] 4 February 2017 at 19:35

To: consultation@shorehamharbour.com

I generally support the plan, particularly the opportunity to reduce carbon emissions by utilising the waste heat from Shoreham power station in a Combined Heat and Power/ District Heating scheme. Also I would like Network Railo to builld a nes line from Southwick to Newhaven via Hove lagoon, King Alfred, I360, Palace pier, marina, Rottingdean, Saltdean, Telscombe, Peacehaven, Newhaven West to Newhaven town, as described in the attached paper. I an [redacted]

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[redacted]

DAVIESMURCH

DEVELOPMENT | STRATEGY | PLANNING

F.A.O. Mr. Chris Jones

Principal Planning Officer

Shoreham Harbour Regeneration Partnership

Adur & Worthing Councils

Portland House

44 Richmond Road

Worthing

BN11 1HS

XX February 2017

Dear Mr. Jones

Consultation Response to the Shoreham Harbour Joint Area Action Plan

Thank you for giving us the opportunity to make comments on the latest version of the Shoreham Harbour Joint Area Action Plan (JAAP) that was published for consultation in December 2016.

The comments set out below are made on behalf of Southern Housing Group (SHG) and officers will be aware that they are the owners of the site known as Free Wharf, within the Western Harbour Arm of Shoreham Harbour. Since summer 2015, SHG have been promoting the redevelopment of the site through pre-application discussions with the Council and through consultation with the public and key stakeholders. They therefore have a detailed knowledge of the issues associated with bringing forward a development proposal within the JAAP boundary.

Having reviewed the latest draft of the document, we generally consider it to be very well thought through and picks up on many of the issues identified by the project team appointed by SHG in relation to the Free Wharf site.

Mobile: 07900 491 490 Office: 0208 560 5460 Email: jonmurch@daviesmurch.co.uk

Company No. is 9190886.

The overarching issue associated with development of the Free Wharf site relates to viability. Delivering a viable scheme is challenging because of abnormal costs which include the decontamination of the site, due to its historic wharf/ industrial use and the need to deliver flood defences. The main way that this can be overcome is through delivering a sufficiently high density of development. However, delivering high densities cannot be at the expense of other planning policies where it would result in unacceptable harm.

My client SHG are a housing association which reinvests all profits made into its core business objectives of providing affordable housing and related services. They already own a significant level of housing stock within the Adur area and will maintain ownership of parts of the Free Wharf site. SHG will therefore be a long-term stakeholder within the area and therefore their interests are aligned with the Council's in that they wish to see the successful delivery and implementation of the JAAP. It is on this basis that these representations have been made.

The preparation of the JAAP needs to be considered against the requirements of the National Planning Policy Framework (NPPF), specifically section 182 and the Planning Practice Guidance (PPG). Section 182 of the NPPF, requires a local plan to be sound when submitted for examination. The tests of soundness are:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

In its current form, we do not consider the JAAP to be sound for the reasons set out below. Where we have suggested alternative wording, we have provided an explanation as to why we do not think the policy/ paragraph does not meet the tests of soundness set out in the NPPF.

<u>Character Area 7 – Western Harbour Arm</u>

Paragraph 2.3.17 identifies the delivery requirements for the WHA, within which the Free Wharf site sits. This includes the delivery of a minimum of 1,100 new homes and 12,000sqm of employment generating floorspace.

In relation to the Council's housing targets, we welcome the introduction of the word 'minimum' as it is essential that there is policy support for optimising housing density on sites to ensure they are viable. We would urge the Council to maintain this wording which is required to ensure the JAAP is both **positively**

prepared and **effective.** Furthermore, we understand that the Council are relying on sites coming forward within the Shoreham Harbour to deliver the new homes that are critical for their five year housing supply targets. Policy support for provision of a minimum number of homes will help to ensure it is **consistent with national policy**.

In relation to the Council's employment target of 12,000sqm of employment generating floorspace, we would urge that this is reconsidered and greater flexibility allowed. Whilst we fully appreciate the historic use of Shoreham Harbour has been for employment and the Council want to see this reprovided, the nature of employment and employment space is changing.

We would highlight that the cost effective location of employment generating use would be the areas of the regeneration zone that run alongside the railway and the A259 rather than on the reclaimed land on the harbourside.

12,000sqm could lead to a significant range in the number of people being employed depending upon the type of uses, for example, office space vs storage use. We would anticipate that the main purpose of the JAAP is to generate the maximum number of jobs and, the right type of jobs.

Furthermore, we are concerned that 12,000sqm is a significant amount of employment space, for which there may not be sufficient demand. It would be counterproductive to the overarching aims of the JAAP for schemes to deliver employment space for which there are no end users.

We would propose the following:

JAAP Ref:	From	To
Para. 2.3.17	This will deliver a minimum of 1,100 new homes and 12,000m2 employment generating floorspace.	This will deliver a minimum of 1,100 new homes and ~~12,000m2~~ employment generating floorspace. *The amount of employment space will be considered on a site for site basis, subject to demonstrating employment opportunities have been optimised and that there is a realistic prospect of finding tenants*.
The current wording is not **justified** as it would not be the most appropriate strategy and would not be **effective** as it could undermine the viability of development and also be counterproductive to the objectives of the JAAP.		

Section 2.4 – What are the constraints in the regeneration area

This section identifies several important factors that need to be considered, as appropriate, by each site as it comes forward. Whilst it is right that these constraints are identified, it is also important to provide clarification as to their impact on the development potential within the Shoreham Harbour area.

There are several of these constraints that my client has needed to consider as part of their development proposals for the Free Wharf site and I deal with each in turn below.

Paragraph 2.4.2 Slipways and hards

Humphrey's Gap which runs north-south on the western side of the Free Wharf site is an historic slipway and hard. The current proposals for the site, maintain Humphrey's Gap providing public realm and access from Brighton Road to the river. It's status as a hard is therefore being maintained.

However, whilst Humphrey's Gap may well have been used as a slipway in the past, this is not its recent function and for reasons that will be demonstrated separately, is inherently unsuitable for such use.

It must be made clear within this paragraph, that simply because there has been some historic use for a slipway and/ or hard that by no means implies there is a policy expectation of such future use.

JAAP Ref:	From	To
Para. 2.4.2	There are several historic slipways and hards in the Western Harbour Arm area. Many of these are in a poor state of repair and unusable for modern craft. However they are an important part of the heritage and character of Shoreham-by-Sea.	There are several historic slipways and hards in the Western Harbour Arm area. Many of these are in a poor state of repair and unusable for modern craft making their future use as such undeliverable. However they are an important part of the heritage and character of Shoreham-by-Sea *and more suitable, alternative locations will be sought for reprovision*.
The current wording is not **justified** as it would not be the most appropriate strategy.		

2.4.3 and 2.4.3 – Historic buildings and conservation areas

The Free Wharf site's relationship with the Shoreham-by-Sea Conservation Area, which also contains a number of listed buildings, has been a key consideration during pre-application discussions with officers. A considerable amount of work and visual material has been produced to consider the impact of SHG's emerging proposals on the heritage assets. This has concluded that there is a significant physical separation between them and limited opportunities for impacting their setting for an unacceptable level of harm to be caused.

It is important that the JAAP recognises the potential scope development within the Shoreham Harbour may or may not have on heritage assets.

JAAP Ref:	From	To
Para. 2.4.3 and 2.4.4	Insert new paragraph at 2.4.5	*It is acknowledged that many of the sites within the Shoreham Harbour area will have limited or no impact on the designated heritage assets and consideration will be given to this on a site by site basis.*
The current wording is not **justified** as it would not be the most appropriate strategy. It is also not **effective** as it may result in too much weight being afforded to the impact on heritage assets restricting the delivery/ viability of development.		

Paragraphs 2.4.12 to 2.4.14 – Hazardous substances

Three Health and Safety Executive (HSE) Consultation Zones are identified within the Shoreham Harbour area, one of which falls within the WHA. We acknowledge the extent of the consultation zone, shown on Map 5 – Planning constraints, does not extend to the boundaries of my clients site, but nevertheless we would welcome clarity on the anticipated timeframe for revoking the hazardous substances consent for the site.

We do not consider the wording as currently drafted would provide the basis for finding the plan unsound, but clarity on this issue would be helpful nonetheless.

Objective 1 and Policies SH1 and SH1.1 – Climate change, energy and sustainable building

SHG want it to be recognised that they place great importance on the green agenda and addressing climate change through sustainable building. As a general principle, they therefore support Objective 1. However, there can be significant viability consequences in trying to satisfy this objective, which could make development unviable or compromise other important objectives of the development plan, such as affordable housing delivery.

My client's experience on other development projects shows that significant reductions can be made to carbon emissions by targeting cultural attitudes, particularly in relation to sustainable transport and less reliance on the use of the private motor vehicle.

In applying this objective to the consideration of development proposals it is important that there is allowance for viability considerations to be considered and balanced against other key objectives.

JAAP Ref:	From	To
Objective 1	To ensure all new developments use energy and water as efficiently as possible, use energy from renewable technologies, use sustainable materials, reduce waste, incorporate innovative approaches to open space, biodiversity, and green infrastructure, encourage uptake of low carbon modes of transport and support sustainable lifestyles in existing and new areas. To maximise opportunities to deliver sustainability objectives through large-scale zero and low-carbon energy technologies to serve the harbour and wider area; particularly those that take advantage of the harbour's coastal location. Shoreham Port will be supported in becoming an	*Without compromising other key Objectives of the JAAP,* to ensure all new developments use energy and water as efficiently as possible, use energy from renewable technologies, use sustainable materials, reduce waste, incorporate innovative approaches to open space, biodiversity, and green infrastructure, encourage uptake of low carbon modes of transport and support sustainable lifestyles in existing and new areas. *Without compromising scheme viability* maximise opportunities to deliver sustainability objectives through large-scale zero and low-carbon energy technologies to serve the harbour and wider area; particularly those that take advantage of the harbour's coastal location. Shoreham Port will be

	important hub for renewable energy generation for the benefit of the sub-region as well as locally.	supported in becoming an important hub for renewable energy generation for the benefit of the sub-region as well as locally.
As currently drafted the wording is not **positively prepared** and may compromise objectively assessed development requirements and is not **justified,** as it does not represent the most appropriate strategy if it fails to deliver other policy requirements.		

JAAP Ref:	From	To
Policy SH1	SH1: Climate change, energy and sustainable building: 3. Development should achieve zero-carbon status (emitting no net annual carbon emissions from regulated and unregulated energy use), in particular within the four site allocations. This will include the use of passive design measures. Proposals must demonstrate good thermal performance and air tightness to prevent heat loss. 5. All new development will be expected to incorporate low and zero carbon decentralised energy opportunities.	SH1: Climate change, energy and sustainable building: 3. Development should *aspire to* achieve zero-carbon status (emitting no net annual carbon emissions from regulated and unregulated energy use), in particular within the four site allocations. This will include, *where feasible,* the use of passive design measures. Proposals must demonstrate good thermal performance and air tightness to prevent heat loss. 5. All new development will be expected to incorporate low and zero carbon decentralised energy opportunities, *where viable and providing this does not compromise other key objectives of the JAAP.*
As currently drafted the wording is not **positively prepared** and may compromise objectively assessed development requirements and is not **justified,** as it does not represent the most appropriate strategy if it fails to deliver other policy requirements.		

My client has significant concerns about the proposed wording of Policy SH1.1 and the absolute terms in which it is currently drafted. Our work on the Free Wharf site to date has shown that the provisions

sought by this policy are highly unlikely to be deliverable for viability reasons. Further details of this will be provided to the Council at the appropriate stage but it is essential that the Council does its own analysis on the implications of this policy before proceeding further.

Alternatively, we would urge the Council to adopt the wording set out below to allow some flexibility.

JAAP Ref:	From	To
Policy SH1.1	1. Development in areas identified in the Shoreham Harbour Heat Network Study (2015), or subsequent update, will be expected to connect to district heating networks where they exist, or incorporate the necessary infrastructure for connection to future networks. 2. Where no heat network is in place, development must be connection ready. All buildings must adhere to the following technical specifications: • Buildings must use a centralised communal wet heating system rather than individual gas boilers or electric heating. • Buildings must allow adequate plant room space to allow for connection at a later date (the exact requirement to be agreed with the councils and their representatives). • The developer must identify and safeguard a pipe route to allow connection between the building and the highway or identified network route where available. • The developer must not in any other way compromise or prevent the potential	1. Development in areas identified in the Shoreham Harbour Heat Network Study (2015), or subsequent update, will be expected to connect to district heating networks where they exist, or incorporate the necessary infrastructure for connection to future networks, *where it is shown that it is viable to do so and without compromising other key objectives.* 2. Where no heat network is in place, development must, *where viable,* be connection ready. *Assuming it is viable*, all buildings ~~must adhere to the~~ *should use the* following technical specifications: • Buildings ~~must~~ *should* use a centralised communal wet heating system rather than individual gas boilers or electric heating. • Buildings ~~must~~ *should* allow adequate plant room space to allow for connection at a later date (the exact requirement to be agreed with the councils and their representatives). • The developer ~~must~~ *should* identify and safeguard a pipe route to allow connection between the building and the highway or identified network

	connection.	route where available. • The developer ~~*must*~~ should not in any other way compromise or prevent the potential connection.
As currently drafted the wording does not meet any of the statutory tests because the implications of the policy have not been appropriately tested, having regard to development viability, and is likely to render development within the Shoreham Harbour area undeliverable.		

Paragraphs 3.2.13 to 3.2.20 – Minerals Wharfs

SHG are concerned to note that paragraph 3.2.13 identifies that the Free Wharf site remains a safeguarded wharf under Policy 40 of the West Sussex Minerals Local Plan (2003) and that a clear strategy has not yet emerged to determine exactly how and where this will be replaced. The paragraph also notes that Kingston Wharf is subject to the same Policy and is also another site that is currently being promoted for residential development.

The implication of the Free Wharf and Kingston Wharf sites retaining their safeguarded wharf status, would undermine the potential for the WHA to deliver it's housing projections and in turn call into question the soundness of the JAAP. This would also have implications for the Council's five year housing supply figures set out in the current draft of the Local Plan.

We would therefore ask that prior to the JAAP being put forward for its Examination in Public further work is done on this point to clarify the situation.

Policy SH3 – Economy and employment

SHG fully support the objectives of the JAAP and consider that the Shoreham Harbour area's on-going role as an economic and employment hub will be essential for the prosperity of the wider area. It will be important however for the policies within the JAAP to be sufficiently flexible to respond to changing employment patterns and industry.

The growth in tech and service industries means that greater density of jobs is capable of being created within smaller business premises so there should not be a slavish reliance on floorspace figures.

JAAP Ref:	From	To
Policy SH3	1. The JAAP proposals support the delivery of a minimum of 16,000m2 of new employment generating floorspace in Adur and 7,500m2 in Brighton & Hove.	1. The JAAP proposals support the delivery of the optimum amount ~~a minimum of 16,000m2~~ of new employment generating floorspace which will be considered on a case by case basis.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Objective 4 and Policy SH4 – Housing and Community

SHG welcome the Council's approach to delivering a significant proportion of housing within the Shoreham Harbour area, and would urge the Council to go further, where possible, to optimise the opportunity presented by each and every site in addressing the substantial need. SHG also fully endorse the Council's approach to looking for a range of unit sizes and tenures to ensure all housing need within the area is sufficiently catered for.

As noted above, viability will play a crucial role in delivering the objectives of the JAAP and its housing policies will be central to that process. It has been SHG's experience on the Free Wharf site that the high abnormal costs of developing the site, drive a requirement for delivering a significant quantity of income producing development, which is best met through market sale properties.

It is critical therefore that the JAAP provides the policy basis to enable development to be delivered.

Notwithstanding this, SHG are a housing association, who act on a not-for-profit basis to deliver affordable housing. In relation to the Free Wharf site, they are looking to bring forward a development that is financially viable, but at the same time satisfies their core business objective of delivering affordable housing.

With the requirement for housing increasing year on year, so do the types of those in need, which reflect a cross section of society. Affordable housing should not simply be accommodation within affordable rent and shared equity tenures. It is likely that SHG will promote a range of unit types on the Free Wharf site including:

- Market sale;

- Discount market sale/ starter homes;
- Market rent;
- Shared equity; and
- Accommodation aimed at down-sizers/ over 55's.

These tenures will provide homes for which there are a significant need and flexibility must be included within the relevant policies.

In relation to unit mix, we note the Council's aspirations for the delivery of family homes, which again, SHG fully support. Our work to date has shown that those family units can only be delivered through flatted development, whilst maintaining viability. Provision of housing on the site is not achievable.

JAAP Ref:	**From**	**To**
Policy SH4	2. Developers will be required to ensure that proposals deliver a mixed and balanced community through providing a mix of dwelling types, sizes and tenures in accordance with identified local needs including suitable family accommodation. A mix of apartments and terraced town houses would be appropriate across all tenures. 3. New residential development will be expected to make provision for a mix of affordable housing, including social rented, affordable rented and intermediate housing in accordance with local plan policies.	2. Developers will be required to ensure that proposals deliver a mixed and balanced community through providing a mix of dwelling types, sizes and tenures in accordance with identified local needs including suitable family accommodation. A mix of apartments and terraced town houses, *where feasible and viable to do so,* would be appropriate across all tenures. 3. New residential development will be expected to make provision for a mix of affordable housing, including social rented, affordable rented and intermediate housing in accordance with local plan policies, *which are subject to individual site viability*.
As currently worded the policy is not **effective** as the policy may make some developments unviable and therefore not deliverable over the plan period.		

Objective 5 and Policy SH5 – Sustainable Travel

SHG fully support the draft objective and policy relating to sustainable travel and car ownership and therefore do not propose any changes to the wording set out.

They would also like to confirm their commitment to look for encouraging more sustainable travel choices rather than relying on private car ownership, given the likely level of intensity of development within the WHA and resulting impacts on the local highway network. Whilst it is expected that the impacts of the development can be mitigated through contributions to the upgrade works identified in part 5 of policy SH5, all opportunities should be promoted for more sustainable travel choices.

SHG would strongly object to any attempts to introduce minimum parking standards given the proposed lifespan of the proposed JAAP. Its policies must be sufficiently flexible to take advantage of opportunities for reducing private car reliance and increasing sustainable travel choices.

The policy should remain as drafted with flexibility and the precise level of parking determined on a site by site basis.

Objective 6 and Policy SH6 – Flood Risk

SHG are fully committed to the above objective and policy requirement delivering a comprehensive flood defense within the WHA and wider Shoreham Harbour area.

Reference is made in point 1 of Policy SH6 to the Shoreham Harbour Flood Risk Management Technical Guide (2015). We note from our own experience during pre-application discussions that some of the guidance provided within this document is unnecessarily onerous and should not apply to all sites. Some flexibility should therefore be allowed within the policy to adherence to this document with the flood defense strategy considered on a site by site basis in consultation with the Environment Agency.

JAAP Ref:	From	To
Policy SH6	1. Development proposals in the regeneration area must comply with the recommendations of the Shoreham Harbour Flood Risk Management Technical Guide (2015).	1. Development proposals in the regeneration area ~~must~~ *should* comply with the recommendations of the Shoreham Harbour Flood Risk Management Technical Guide (2015) *or put forward an alternative design solution which must be approved by the relevant stakeholders*.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

In addition to the proposed policy amendment we would also note that the delivery of a comprehensive flood defense does have significant viability implications. The cost of this may prevent some other planning gains being delivered and/ or result in the need for high density development. Comments on viability are being picked up elsewhere within the representations.

Objective 8 and Policy SH8 – Recreation and Leisure

My client is generally happy with the wording of Policy SH8 and the emerging proposals for the Free Wharf site will deliver on the vast majority of the objectives sought. The exception to this is in relation to new/ improved slipways or hards, for the reasons previously set out in this letter. SHG has no objection to the wording of the policy as currently drafted but we are aware of vocal lobbying groups that may be making representations to make the policy more onerous.

For reasons that will be clearly set out within separate documentation, the Free Wharf scheme is unable to accommodate a slipway and we would reserve our right to make further representations on this point should the policy be amended.

Objective 9 and Policy SH9 – Place Making and Design Quality

We very much support the requirements of the above Objective and Policy, which in summary seeks high standards in respect of design and place making. SHG will retain some of the housing stock within the Free Wharf development and therefore have a long term interest in it being a good place to live.

They therefore welcome the high hurdles established within the policy although would note that the appropriate balance will need to be struck with viability to ensure development is deliverable. It is understood that this should not be at the expense of delivering sustainable development.

Character Area Proposals – Western Harbour Arm

Map 12 – Western Harbour Arm

My clients site sits within the area shown on Map 12 – Western Harbour Arm. No concerns are noted with regards to the annotations on the map, although we would request that the allocations for Viewpoints/ Public Art Opportunities and Junction Improvements remain as indicative. Whilst it remains SHG's intention to deliver significant public benefits as part of the scheme, they will impact viability so the level of provision will need to be assessed as part of an overall package of planning benefits within the application.

Environmental Considerations – Paragraph 4.7.13

We are pleased that the Council note the significant list of constraints that will impact upon development within the WHA, some of which apply to my clients site and significantly impact upon the viability of the forthcoming planning application.

Paragraph 4.7.14 to 4.7.17 – Historic Assets

Extensive discussions have taken place with the Council about the impact of the proposals for the Free Wharf site on Shoreham's historic assets. This has included producing various verified views locally and from key vantage points which are further afield.

The outcome of this process is that it is difficult to see the WHA from within the conservation area because of the fine-grained nature of the streets. Some glimpsed views are possible from certain positions but none that we have tested significantly or negatively impact the setting of the heritage assets.

Similarly, views from the site and surrounding area do not have a significant impact on heritage assets within and including the conservation area because of the distance between them. It is acknowledged that some long-distance views of the church tower will be lost, which is an inevitable consequence of

development but this is mainly confined to an area on Shoreham beach and views from other locations are not impacted.

We are concerned that the wording of the JAAP as currently drafted could be interpreted that it protects against the loss of 'any view' of the St Mary de Haura Church and/ or other heritage assets which clearly isn't the case.

JAAP Ref:	From	To
Paragraph 4.7.15	The wider town centre conservation area includes 47 listed buildings; including the Grade I listed St Mary de Haura Church. The church is clearly visible from Shoreham Beach, the South Downs and much of the wider area and it will be important for any new development at the harbour to respect views of the church and its setting.	The wider town centre conservation area includes 47 listed buildings; including the Grade I listed St Mary de Haura Church. The church is clearly visible from Shoreham Beach, the South Downs and much of the wider area and it will be important for any new development at the harbour to respect *key/ important* views of the church and its setting.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Residential Development – Paragraph 4.7.44

SHG welcomes the proposal to deliver a minimum of 1,100 new dwellings within the WHA and would urge the Council to make sure it takes advantage of optimising the development potential of every site coming forward to help address the critical shortfall in housing provision.

Employment-generating floorspace – Paragraphs 4.7.46 to 4.7.51

Again, SHG welcomes the proposal to re-imagine the type of employment floorspace within the WHA and considers that, if carefully planned, it could deliver the envisaged business hub.

From SHG's experience with the Free Wharf site, it is important that all proposals for employment land are well thought through and expertise is sought from local commercial agents who understand local need. It would significantly detract from the desirability of the area if ill-conceived speculative employment space was allowed that remained vacant.

New waterfront route and open spaces – Paragraph 4.7.53 to 4.7.57

The emerging proposals for the Free Wharf site include a publicly accessible pedestrian and cycle route along the waterfront. This is a major public benefit by SHG who very much hope other sites will look to provide the same. However, this does come at significant cost to the scheme and will be an important consideration in relation to scheme density and trade off in discussions around viability and scale of development.

Waterfront features and facilities – Paragraph 4.7.58

Similarly, to the comments made above regarding the proposed pedestrian and cycle route, it is intended that the proposals for the Free Wharf site, will deliver floating pontoons improving access to the river. Again, this will be a major public benefit for the scheme but will have viability implications for the scheme which will need to be weighed in the balance at the appropriate stage.

Social and Community Infrastructure – Paragraph 4.7.62

This paragraph notes that there may be some need to provide contributions towards social and community infrastructure to support the increasing population within the WHA. The paragraph should also note the potential for schemes to provide this on site, through public open space, public realm, leisure facilities, cafes/ restaurants etc. We note that the text is incomplete and this may already be taken into account. We have suggested wording for completeness.

JAAP Ref:	From	To
Paragraph 4.7.62	Contributions towards improving local community facilities, or in some instances, provision of new facilities, will be required to support the increased population resulting from development of the Western Harbour Arm. Full details are contained within the Infrastructure Delivery Plan (IDP) that accompanies the Adur Local Plan (2016). Refer also to Policy SH16 in Section 5. Social and community infrastructure	Contributions towards improving local community facilities, or in some instances, provision of new facilities, will be required to support the increased population resulting from development of the Western Harbour Arm. Full details are contained within the Infrastructure Delivery Plan (IDP) that accompanies the Adur Local Plan (2016). Refer also to Policy SH16 in Section 5. Social and community infrastructure requirements

	requirements include:	include: • Public realm/ open space; • Leisure facilities; and • Restaurants/ cafés. Some of the above can be provided on site where appropriate.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Paragraph 4.7.65 - Education

As part of the pre-application discussions for the Free Wharf site, it has been identified that there is a shortfall in available primary school places. We also understand that the County Council are working with Adur Council to address this issue.

SHG would request that further detail of how this shortfall in primary school place will be addressed as soon as possible to ensure sufficient infrastructure provision to support the growth in population within the WHA. We would ask that this be clarified prior to final adoption of the JAAP.

Paragraphs 4.7.69 to 4.7.75 - Development Form and Typology

The guidance provided in relation to the layout of the buildings on sites is helpful but this should be interpreted flexibly on a case by case basis to take advantage of site opportunities and respond appropriately to constraints.

We are concerned about the Council 'pinning their colours to the mast' in respect of the statement made in paragraph 4.7.72, specifically:

"In general, buildings should be developed up to 5 storeys on the Brighton Road (A259) and River Adur frontages."

We are concerned that this will be interpreted as fixed and some more flexibility should be assumed. Clearly, there will be opportunities for more varied buildings heights, particularly along the river frontage which should be considered on a site by site basis. We would suggest the following:

JAAP Ref:	From	To
Paragraph 4.7.72	In general, buildings should be developed up to 5 storeys on the Brighton Road (A259) and River Adur frontages.	In general, buildings *heights along* ~~should be developed up to 5 storeys on the~~ Brighton Road (A259) and River Adur frontages *should provide variety and interest taking account of site characteristics. Appropriate building heights are likely to be between four to seven storeys.*
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

We are also concerned about comments made in paragraph 4.7.73 in relation to the potential for taller buildings creating issues such as traffic congestion, infrastructure provision and poor microclimate. In respect of traffic congestion, we don't understand this point and in our project teams experience we have not come across such an issue before. In relation to infrastructure provision, this is more of a symptom of density, rather than a specific impact of a tall building. In respect of micro-climate, this is an important consideration in designing tall buildings, but with appropriate and sophisticated modelling, such issues can be effectively designed out at application stage.

We would argue that the main issues relating to tall buildings relate to townscape and that careful consideration should be given to this at pre-application and application stage following best practice guidance.

We welcome and strongly agree with comments that deeper sites potentially dispose themselves to accommodating tall buildings but these are not necessarily the only locations where tall buildings can feature.

JAAP Ref:	From	To
Paragraph 4.7.73	Significantly taller buildings could create issues, such as traffic congestion, infrastructure provision and creation of a microclimate through trapping of air pollutants. There may be scope to consider slightly taller buildings in the centre of deeper sites provided that it can be demonstrated that these issues have been addressed, and the proposal is of exceptional design quality.	Significantly taller buildings could create *townscape* issues, *which will need to be carefully considered at application stage. Other issues* such as ~~traffic congestion~~, infrastructure provision and creation of a microclimate through trapping of air pollutants *will also need the appropriate consideration*. There may be scope to consider slightly taller buildings in the centre of deeper sites *or at other important townscape nodes,* provided that it can be demonstrated that these issues have been addressed, and the proposal is of exceptional design quality.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Paragraphs 4.7.74 to 4.7.75 comment on unit mix and we welcome the JAAP's comments in relation to increasing demand for smaller units.

However, we would urge the Council to go further than this in relation to the increasingly important role that one bed units play, in terms of affordability, particularly for first time buyers and also viability.

In relation to terrace housing which the JAAP proposes to make up 10% of the unit mix for the WHA, it is difficult to see how houses can be appropriately accommodated but we note the flexibility allowed for within the paragraph.

JAAP Ref:	From	To
Paragraph 4.7.75	Across SS4 – Western Harbour Arm Waterfront as a whole the following mix of dwelling sizes is considered suitable: • 90% flatted development: ♣ 25% 1 bed ♣ 40% 2 bed ♣ 35% 3 bed • 10% terraced housing (split between 2, 3 and 4 beds).	Across SS4 – Western Harbour Arm Waterfront as a whole ~~the following~~ *a* mix of *one, two and three bed* dwelling sizes is considered suitable *which may vary depending upon and up to date need.* ~~• 90% flatted development:~~ ~~♣ 25% 1 bed~~ ~~♣ 40% 2 bed~~ ~~♣ 35% 3 bed~~ ~~• 10% terraced housing (split between 2, 3 and 4 beds).~~
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Policy SH16 – Western Harbour Arm

Comments in relation to Policies SH16, SH16.1 and SH16.2 are consistent with those already made above in relation to the supporting text.

JAAP Ref:	From	To
Policy SH16	6. Building heights of up to five storeys are generally considered acceptable on the Brighton Road and River Adur frontages.	6. Building heights ~~of up to five storeys are generally considered acceptable on the~~ along Brighton Road and River Adur frontages *should vary to provide interest and variety*. *Their height should respond to their context and could range between four to seven storeys.*
	10. Developments should be sufficiently set back from the riverside (at least 8m from harbour wall to building) to incorporate the new waterfront route.	10. Developments should be sufficiently set back from the riverside (at least 8m from harbour wall to building *or at an alternative distance agreed with the Environment Agency*) to incorporate the new waterfront route.

As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.

Policy SH16.1 – Flood Risk Management

Comments relating to this policy reflect comments already made above and the proposed changes are set out below.

JAAP Ref:	From	To
SH16.1	1. Development proposals must accord with the principles and approach to flood risk management set out in the Shoreham Harbour Flood Risk Management SPD (2012).	1. Development proposals ~~must~~ *should* accord with the principles and approach to flood risk management set out in the Shoreham Harbour Flood Risk Management SPD (2012).
	8. Developments should be set back from the riverside by at least 8m from wharf wall to building for flood defence maintenance requirements.	8. Developments should be set back from the riverside by at least 8m from wharf wall to building, *or at other appropriate distances agreed with the Environment Agency and other stakeholders,* for flood defence maintenance requirements.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Policy SH16.2 – Sustainable building

JAAP Ref:	From	To
SH16.2	2. Development will be expected to incorporate low and zero carbon decentralised energy generation.	2. *Where viable to do so* ~~D~~*d*evelopment will be expected to incorporate low and zero carbon decentralised energy generation.

	3. Development will be expected to consider heat networks and to either connect, where a suitable system is in place (or would be at the time of construction) or design systems so they are compatible with future connection to a network.	3. *Where viable to do so* ~~*D*~~*development* will be expected to consider heat networks and to either connect, where a suitable system is in place (or would be at the time of construction) or design systems so they are compatible with future connection to a network.
As currently worded the policy is not **justified** as it doesn't represent the most appropriate strategy considered against reasonable alternatives.		

Paragraphs 5.1.1 and Policy SH17 – Infrastructure Requirements

We have reviewed the above policies and don't have any specific comments to make but SHG would like to underline the necessity for developments within the Shoreham Harbour Area to support the delivery of the appropriate infrastructure to allow for full implementation of the JAAP. It is SHG's experience on the Free Wharf site that delivery of many of the sites within the JAAP will be very challenging for viability reasons. They would therefore strongly resist additional financial burdens, such as the introduction of a Community Infrastructure Levy that would introduce indiscriminate charging and may make some sites undeliverable.

We would encourage the Council and any other bodies to seek all sources of funding, wherever possible, to assist in supporting critical infrastructure provision.

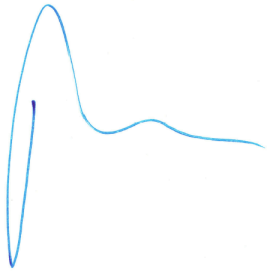
Summary

Thank you for giving us the opportunity to comment on the latest draft of the JAAP, which we consider to be in good shape. The comments set out above is largely tinkering of the proposed wording, drawing upon the experience of the project team working on the Free Wharf site.

We therefore hope that the comments are helpful in enabling the delivery of the JAAP.

We would be very grateful if you would keep us in the loop on progress and we would be very happy to meet with you at your convenience to discuss our comments in greater detail.

Yours sincerely,



Jon Murch

DaviesMurch

Shoreham Harbour Regeneration

[redacted]

7 February 2017 at 18:32

- I welcome the recognition of Southwick beach for Surfing and other watersports, but in actual fact Surfing takes place at other locations as well (e.g. in the Harbour Arms)
- Plan Objective 8 and policy SH8 should protect and enhance Surfing throughout in the Port area
- I support policy SH7.1 to improve water quality in the Port area.

[redacted]

At any given good surf day (all year round) over 100 surfers\water users can be seen enjoying the Waves.

See attached for proof > https://www.youtube.com/playlist?list=PLqrXuUebV8N-84CJN8p52R57MWiZZP9Uk

Surfing Videos Brighton England - YouTube

www.youtube.com

Surfing Footage - Brighton\\Shoreham\\Southwick\ \Hot Pipe\\Shoreham Harbour South Coast of England

Shoreham Harbour Consultation

[redacted] 7 February 2017 at 18:37

To: consultation@shorehamharbour.com

Dear Sir/Madam,

Re: Shoreham Harbour Consultation

Please find enclosed my response to the Shoreham Harbour consultation.

Please note the proposals to improve reliability to bus operations in the Shoreham area. This is essential for new job, retail and tourism opportunities from Hove to Shoreham.

Yours faithfully,

[redacted]

[redacted]

Draft Joint Area Action Plan
Public Consultation
16th December 2016 to 10th February 2017

Please review the Draft Shoreham Harbour Joint Area Action Plan 2016 before filling in this form. The plan is available at local council offices and libraries or online at:
www.adur-worthing.gov.uk/shoreham-harbour-regeneration/consultation

Please note:

- This form is only for representations on the Shoreham Harbour Joint Area Action Plan.
- Please do not use this form to comment on specific planning applications.
- If you wish to comment on the proposed development by Southern Housing Group at Free Wharf, please visit: www.freewharf.info
  Adur District Council has not yet received a planning application for this site, representations received during consultation on the Joint Area Action Plan cannot be considered when determining a later planning application.

Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:	
Your name	[redacted]
Organisation *(if applicable)*	
Address	[redacted]
	Postcode [redacted]
Phone Number	
E-mail Address	[redacted]

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	
	Postcode
Phone Number	
E-mail Address	

Where do you live?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove	√	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing	√	Other	

Please specify if 'other'	

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website	√	via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	√	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	√	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	√	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	√	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	√	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: I agree with new housing, retail or business sites. These should not be more than 3 levels high. Please do not consider tall tower blocks as these may look out of place with other buildings in the surrounding areas. Please input Section 106 funding for improved, extended or new bus services. This is especially good for retail or housing developments. E.g. New supermarket.	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Policy – Shoreham Harbour Transport Strategy – Sustainable Travel. To improve connections and promote sustainable transport choices.	**SH 16.5**

Comments: To introduce two peak hour bus lanes on the A259 in the Shoreham area.

A) A Morning Peak bus lane Eastbound on the A259 Brighton Road, from West Beach (South Lancing) The Broadway to the roundabout junction with Salts Farm Road/The Saltings. This could operate 06.30 to 09.30 Mondays to Fridays only. At other times to be used for parking (as now).

B) An Evening Peak bus lane Westbound from Shoreham Lighthouse (Kingston Beach) to Shoreham (Riverside Business Centre), opposite Surry Street. This could operate from 16.00 to 19.00 Mondays to Fridays.

Aims of the peak hour flow bus lanes include:

- ✓ Improving reliability of Stagecoach South bus route 700 (Arundel, Littlehampton, Worthing, Shoreham, Hove and Brighton).
- ✓ Allow conditions for new bus services such as a 700X to provide quick express commuter, shopping and tourism links. This would support the new job and leisure opportunities as part of the Shoreham Harbour developments.
- ✓ To assist reliability on routes 2 and 60 during evening peak hours heading towards Steyning.
- ✓ To improve reliability of Compass Travel Bus route 19 from Shoreham Beach to the Holmbush Centre and vice versa.
- ✓ To allow Compass Travel to position buses (from Worthing bus depot) on various routes including the 19 during peaks hours without delays.
- ✓ With the effective use of Section 106 funding – to provide support to bus companies (for up to a year) to introduce new services linking into the Shoreham area.

Paragraph/Policy/Map no	

Comments:

Paragraph/Policy/Map no	

Comments:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

Equal opportunities

Gender				*Please tick one box only*	
Male	√	Female		Prefer not to say	

Age				*Please tick one box only*	
Under 20		20 to 29		30 to 39	
40 to 49		50 to 59		60 or over	
				Prefer not to say	√

Are you retired?				*Please tick one box only*	
Male		Female		Prefer not to say	√

Are your day to day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?				*Please tick one box only*			
No		Yes, limited a lot		Yes, limited a little		Prefer not to say	√

Ethnicity				*Please tick one box only*	
Asian/Asian British		**Black/Black British**		**Chinese/Other**	
Indian		Black Caribbean		Chinese	
Pakistani		Black African		Other ethnic group	
Bangladeshi		Other Black			
Other Asian					
Mixed parentage or heritage		**White**			
White & Black Caribbean		White British	√		
White & Black African		White Irish			
White & Asian		Other White			
Other mixed parentage				Prefer not to say	

Thank you for completing this form

Please return completed forms to: email: consultation@shorehamharbour.com

All forms must be received by 5pm on 10th February 2017

Aldrington Basin/A259/Wharf Road

[redacted] 7 February 2017 at 23:38

To: consultation@shorehamharbour.com

Aldrington Basin

-

It is imperative and urgent there is a new access road into and out of Shoreham Port via Church Road as outlined. Unnecessary HGV traffic on the A259 pumping out noxious particles is not sustainable as is the dangerous 180 degree turn into and out of Wharf Road.

With 300 properties planned and new businesses around the basin, there should be a an emphasis on opening up new and existing green spaces and views around the Aldrington Basin alongside new cafes, eateries, and independent retail outlets particularly along Kingsway. With all these new residents and workers there is currently very little good leisure or retail to support the community without travelling. In the light of new fuel technologies now and due in the near future, new developments should allow for residents and visitors to use cars freely and therefore facilitate parking.

New housing developments should be bold and of a 21st century design to create a new history. They should be suitable in design and materials to reflect its coastal/port position, not pastiche suburbia developments because most of the pre-existing housing have no architectural merits left, have had windows and doors replaced with white plastic and many extensions and alterations. The Guillespe report commissioned by the city council states that the north side of Kingsway is run down and contemporary design should be encouraged.

A259/Wharf Road Junction

-

This junction itself is fine having recently been improved, and any measure to further control traffic under current circumstances is concerning as it may create more pollution and congestion due to queuing HGV traffic. This junction is simply not suitable for HGV traffic and never has been. A new route for HGV traffic should free this junction to become simpler or replaced with a roundabout. Currently HGV traffic sitting at traffic lights outside residential properties is not ideal, and further travelling onto Wharf Road alongside Hove lagoon popular with dog walkers, children, the elderly etc. is very dangerous. Wharf Road is to be a designated green corridor and cycle way, however this would not be possible with 24/7 HGV traffic, car parking and lorry fly parking. Wharf Road is a narrow two lane road with one side having designated parking and very narrow pavements either side. It is dangerous for pedestrians on the pavements of Wharf Road due to their narrow nature and small openings onto Hove lagoon, two large HGVs cannot pass each other with the current road set up. It is also imperative to reduce noise pollution as well as air pollution, and better road surfacing and lorry dampening is desperately needed and overdue. Therefore it is Wharf Road that needs improvement, redesign and redirection of the HGV traffic to facilitate the JAAP.

[redacted]

Sussex Wildlife Trust

[redacted]

By email only
Attn: Chris Jones
Shoreham Harbour Regeneration Team
Adur District Council

Date: 07/02/2017

Dear Mr Jones

Shoreham Harbour Joint Area Action Plan – Revised Draft for Consultation December 2016

The following comments are made on behalf of the Sussex Wildlife Trust in relation to biodiversity and the **Shoreham Harbour Regeneration Plan**.

We welcome the production of a JAAP for this area and feel encouraged to see that some of our comments made back in the 2014 consultation have been incorporated into the current draft. We now see from the plan that a green infrastructure strategy is integral to the delivery of the JAAP. We strongly support the progressive approach being taken in the formulation of the green infrastructure strategy.

The evidence base for the JAAP includes a Green Infrastructure (GI) Study. Given the urban nature of the area, we are pleased that this GI study appreciates the importance of looking at green spaces such as verges and areas surrounding and within housing estates. These types of green spaces often are key delivery areas for ecosystem services in urban settings, but are easily overlooked.

We hope that the authorities that make up this JAAP partnership will adopt a similar approach in their own GI strategies.

Vision
The wording of the vision should show a stronger commitment to add to the Natural Capital of the area. Please see our comments regarding Objective 7 for a justification.

Strategic objectives – Objective 7
We are pleased to see a commitment to the natural environment and having read this plan in its entirety, there seems to be real potential to deliver gains within the natural environment. However the objective should be more concise regarding its ambition. Therefore we suggest the following wording is added to the start of the objective:

Woods Mill, Henfield, West Sussex BN5 9SD
01273 492630 enquiries@sussexwt.org.uk sussexwildlifetrust.org.uk

President: David Streeter MBE Chairman: Carole Nicholson Chief Executive: Dr. Tony Whitbread

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VAT Registration No. 191 305969. Registered Office: Woods Mill. Henfield. West Sussex BN5 9SD

Objective 7 – Natural Capital
Add to the Natural Capital of the area by delivering net gains to biodiversity and a multifunctional green infrastructure network…

This wording will help to clearly communicate the aspirations of the plan and will also compliment the visions and objectives within the emerging Adur Local Plan. It will help to demonstrate the progressive nature of the JAAP and its understanding of emerging approaches reported on by the Natural Capital Committee. Additionally, by incorporating the term 'net gains' it clearly matches the ethos of section 109 of the NPPF.

Area Wide Policies

SH7: Natural Environment, Biodiversity and green infrastructure

The Sussex Wildlife Trust would recommend that bullet point one is expanded so that it reads as follows:

"The partnership will prepare a green infrastructure strategy ***and identify mechanisms for its implementation*** for the regeneration area and its surroundings…"

The addition of ***identify mechanisms for implementation*** helps to demonstrate that it will be an active strategy and not simply a mapping exercise.

We are really pleased to see bullet point 6 include a range of possible enhancements to the area and welcome the approach to make it clear that the measures to enhanced biodiversity are not limited to those stated in the policy. This will enable the policy to ensure that the most appropriate enhancements to a particular area at the time of actual development are used.

We are very encouraged to see bullet point 6 give clear recognition to the importance of off-site enhancements, through contributions to management and monitoring plans for local conservation sites such as Shoreham beach and Widewater Lagoon Local Nature Reserves. This inclusion shows an understanding of the important part these sites play in the vicinity of the JAAP.

SH7.1 Water Quality
Bullet point 3 makes clear that development will need to connect to the sewerage system and where it is not the case; appropriate contributions will be required to upgrade the network. The Sussex Wildlife Trust therefore assumes that this means that package treatment works will not be considered to be a suitable option for proposed developments. We would support this approach.

SH7.3

As per Good Environmental Status Indicator 11 – Underwater Noise and other forms of Energy - of the Marine Strategy Framework Directive, Policy SH7.3 should include underwater sources and receptors of noise.

We would also ask if the partnership see any occasion when it might be necessary to consider having policy wording relating to lighting/light pollution?

Character Areas

South Quay side
We note that section 4.1.10 of the port masterplan proposes additional turbines further east as shown in map 6. We do feel that map 6 shows clearly where those proposed turbines are to be located.

Aldington Basin
We are pleased to see the area priorities make clear reference to the enhancement of biodiversity by creating and improving green infrastructure links, including a green corridor along the A259.

We support paragraph 4.2.21 which indicates the need for developers to include SuDs as parts of proposals.

It is apparent from the supporting text, section 4.2.23 through to 4.2.25, that there are good opportunities and intentions in this character area to deliver towards the green infrastructure of the area.

Policy SH11
Our comments relate to section SH11.3. We are supportive of policy wording that demonstrates commitment to the delivery of natural capital in the form of biodiversity enhancements and green infrastructure provision.

We would suggest that bullet point two of SH11.3 would benefit from the addition of the wording '***identify mechanisms for implementing***' so that it reads:

The partnership will support ***and identify mechanisms for implementing*** ecological and landscape improvements…

North Quayside and South Portslade
We are pleased to see the area priorities make clear reference to the enhancement of biodiversity by creating and improving green infrastructure links, including a green corridor along the A259.

As mentioned earlier in our consultation response we are encouraged to see that the supporting text (4.3.18 through to4.3.23) has identified a creative and relevant approach to delivering green infrastructure and improving the natural capital of the JAAP area.

Policy SH 12
Bullet point two of SH12.3 would benefit from the addition of the wording '***identify mechanisms for implementing***' so that it reads:

The partnership will support ***and identify mechanisms for implementing*** *ecological* and landscape improvements…

Can we clarify if bullet point 4 of SH12.3 means that that proposed green corridor will sit outside the propose development boundary for Wellington Road?

Portslade and Southwick beaches
We are encouraged to see the areas priorities pay attention to the need to protect and enhance important habitats and safeguarding of the beach area.

The supporting text for this character area has utilised the information from the vegetated shingle assessment, which is welcomed as an informative evidence document in the formulation of this plan. We are pleased to see the recognition of Basin Road South SNCI as the largest example of vegetated shingle in Brighton and Hove. We hope this site can be seen as a starting point for to vegetated shingle enhancements along this stretch of beach.

Policy SH13
We are supportive of bullet point 2 but would suggest that it could be strengthened by saying:

The partnership will promote and deliver the enhancement and creation of vegetated shingle habitats to create a continuous corridor along the beaches through mechanisms such as developer contributions/106/CIL .

It may also be appropriate to consider wording within the policy which recognises the benefit of interpretation of the vegetated shingle areas due to its sensitivity to disturbance by increased footfall.

Fishersgate and Southwick
Looking at the area priorities alongside the sites identified in the green infrastructure study in this character area, we are encouraged that they have the potential to deliver a number of multifunctional benefits..

We are pleased to see the supporting text in section 4.5.20 state that the partnership will support the Shoreham Port Authority to manage and enhance this area for the benefit of ecology. We welcome this cooperation to deliver gains to the natural capital of the area.

We welcome the creative approach of including the grassed spaces around the areas of social housing as part of the forth coming GI strategy. We would hope that this not only brings ecological benefits but could offer the people living in those areas benefits from the formation of community gardens.

Policy SH14
We make the following recommendations in relation to bullet point 2 of SH14.4:

The partnership will support ***and identify mechanisms for implementing*** ecological and landscape improvements…

The Sussex Wildlife Trust encourages the provision of signage for interpretation of the marine environment as part of the redevelopment of the Lady Bee Marina: explanation of the impacts water users have on the marine environment and best practises to minimise these.

Harbour Mouth
While we support the description of the vegetated shingle in section 4.6.6, it would be appropriate to highlight that the designating feature for the LNR is the internationally rare habitat of vegetated shingle.

Policy SH15
The Trust welcomes bullet point 3 of the policy which ensures that the partnership will work to protect the Shoreham Beach LNR. Bullet point 4 also urges the promotion of interpretation of the marine environment and biodiversity. We encourage this approach and the intention to work with the local community.

The Sussex Wildlife Trust would support positive signage for interpretation and understanding of vegetated shingle in particular (reasons as above).

Policy SH7 bullet point 6 gives clear recognition of the importance of off-site enhancements, through contributions to management and monitoring plans for local conservation sites such as Shoreham Beach and Widewater Lagoon Local Nature Reserves. This inclusion shows an understanding of the important part these sites play in the vicinity of the JAAP.

The Sussex Wildlife Trust recommends that policy SH15 includes wording relating to the fact that the plan will seeks funding/contributions to provide appropriate management and monitoring of the LNR protected areas.

Harbour Western Arm

This character area appears to show the most considerable changes in terms of redevelopment and we are therefore encouraged that the area priorities do still show that enhancement of the natural environment will be a key priority of this area. In particular we welcome the recognition of the potential of this area to deliver net gains for biodiversity as stated in section 4.7.30.

Section 4.7.31 is a positive approach to SuDS and we welcome the approach of rain gardens and green walls that can offer multifunctional benefits.

4.7.33 also highlights that the proposed waterfront route could include areas of vegetated shingle. We are pleased to see this suggestion as it offers an opportunity to increase awareness of this valuable habitat.

Policy SH16.3

We make the following recommendations to bullet point 2:

The partnership will support ***and identify mechanisms for implementing*** ecological and landscape improvements…

Given the scale of development suggested in this character area, we support the approach to specifically recognise the marine environment and identify opportunities for ecological enhancements.

Delivery and Implementation

It would be beneficially for the JAAP to include an appendix/live link with the relevant sections of the Adur and Brighton and Hove Infrastructure Delivery Plans.

We wonder whether this section of the draft plan should include information on the evidence bases that will inform delivery and Implementation. Therefore policy SH17 could include wording to highlight the commitment of the partnership to produce a green infrastructure strategy.

In conclusion

We are encouraged that the JAAP partnership has taken steps to have a consultation with an evidence base that has included the identification of GI assets early on in the process.

We would encourage the partnership to contact the Sussex Biodiversity Record Centre and enquire about the potential to use Ecoserve to inform the future Green Infrastructure strategy.

Ensuring that biodiversity and open spaces are adequately planned for at the start of this process will help to ensure that actions need to implement net gains for biodiversity can be identified and implemented by Infrastructure Delivery Plans and other suitable mechanisms. The Sussex Wildlife Trust believes careful consideration of the Marine Strategy Framework and the Water Framework Directive is

paramount to this plan and would like to see careful cooperation with the Adur and Ouse Catchment Partnership.

If you have any questions regarding our response we would be happy to discuss them with you. We would like to continue to keep the dialogue with the partnership open to ensure positive progress for this plan on the Natural Environment.

Yours sincerely

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Our Ref: 10017/KM
Your Ref:
Email: kmatthews@firstplan.co.uk
Date: 08 February 2017

Shoreham Harbour Regeneration,
Adur & Worthing Councils,
Portland House,
44 Richmond Road,
Worthing,
West Sussex,
BN11 1HS

Dear Sirs

Revised draft Shoreham Harbour Joint Area Action Plan

We write on behalf of our client, Day Group Ltd, who import materials by water and operate an aggregates bagging plant at Kingston Railway Wharf, Brighton Road, Shoreham by Sea. This site is located within the Western Harbour Arm area.

Day Group gained planning permission in September 2010 for the temporary use of the site for an aggregates bagging plant. This permission has been renewed twice and the area of their site has been extended. The current consents expire in October 2018.

We have completed the consultation questionnaire and have set out our further comments on the Shoreham Harbour Joint Area Action Plan (JAAP) in this letter.

In the supporting text on Minerals Wharfs (Paragraphs 3.2.13 – 3.2.24), the draft JAAP identifies that Kingston Railway Wharf is safeguarded under Policy 40 of the West Sussex Minerals Local Plan (2003). The draft text at Paragraph 3.2.22 sets out that:

> ***"In accordance with the emerging minerals local plans and the NPPF any applications for alternative development proposals on safeguarded minerals wharves or adjacent sites will need to clearly demonstrate that there will be no net loss to capacity for the import of aggregates at the port as a result of the proposals."***

Day Group support this approach. It is essential that there continues to be sufficient protected wharf capacity in order for the draft JAAP to be considered to be in accordance with the National Planning Policy Framework.

Draft Policy SH3 states that:

> ***"Prior to sites coming forward for redevelopment to alternative uses, planning permissions for continuation of current employment uses may be granted for temporary periods on a case-by-case basis."***

Day Group support this Policy. Temporary consents have allowed Day Group to make temporary use of a site, unsuitable for many others. The proximity of the site to the functional port has provided sustainability benefits in reducing minerals transportation for bagging further afield. The use of the site has created employment opportunities and has contributed to meeting a need for aggregates in the County.

Paragraph 4.7.51 of the draft JAAP recognises that the release of sites for redevelopment to alternative uses along the Western Harbour Arm is a long term process which requires careful management and will rely on working in collaboration with landowners and businesses.

Day Group's aim is to relocate closer to the functional port area. However, there has been a lack of suitable sites available for some time. It is hoped that a new site will be found soon but, in the meantime, it is important that the JAAP allows for ongoing temporary consents which can be granted on a case by case basis, to help manage this change.

Where continued use can be made of the wharf facilities (even for a temporary period) it is clearly good planning practice to ensure that this is supported and facilitated. This approach is underpinned by the National Planning Policy Framework requirement, in terms of a presumption in favour of sustainable development and to ensure in plan-making that Plans are sufficiently flexible to adapt to rapid change.

Overall, Day Group support the draft plan. Without the measures to allow temporary consents, and the recognition of the importance of protecting wharf capacity, the plan would be considered to be unsound. Day Group would therefore wish to comment further if changes are made to these aspects of the plan.

I trust this information is sufficient and will be taken into account when reviewing the draft JAAP. Please do not hesitate to get in touch should you have any queries.

Yours faithfully

KATE MATTHEWS
Director

[redacted]

Day Group
Day Group

Draft Joint Area Action Plan
Public Consultation
16th December 2016 to 10th February 2017

Please review the Draft Shoreham Harbour Joint Area Action Plan 2016 before filling in this form. The plan is available at local council offices and libraries or online at:
www.adur-worthing.gov.uk/shoreham-harbour-regeneration/consultation

Please note:

- This form is only for representations on the Shoreham Harbour Joint Area Action Plan.
- Please do not use this form to comment on specific planning applications.
- If you wish to comment on the proposed development by Southern Housing Group at Free Wharf, please visit: www.freewharf.info
  Adur District Council has not yet received a planning application for this site, representations received during consultation on the Joint Area Action Plan cannot be considered when determining a later planning application.

Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:			
Your name			
Organisation *(if applicable)*	Day Group Ltd.		
Address	Transport Avenue		
	Brentford		
	Middlesex	Postcode	TW8 9HQ
Phone Number	[redacted]		
E-mail Address	[redacted]		

Your agent's contact details: *(if applicable)*			
Agent's name	Kate Matthews		
Organisation *(if applicable)*	Firstplan		
Address	Bramah House		
	65-71 Bermondsey Street		
	London	Postcode	SE1 3XF
Phone Number	[redacted]		
E-mail Address	[redacted]		

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		London			

Where do you work?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		London			

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			✓
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	Paragraphs 3.2.13 – 3.2.24

Comments:

In the supporting text on Minerals Wharfs (Paragraphs 3.2.13 – 3.2.24), the draft JAAP identifies that Kingston Railway Wharf is safeguarded under Policy 40 of the West Sussex Minerals Local Plan (2003). The draft text at Paragraph 3.2.22 sets out that:

> *"In accordance with the emerging minerals local plans and the NPPF any applications for alternative development proposals on safeguarded minerals wharves or adjacent sites will need to clearly demonstrate that there will be no net loss to capacity for the import of aggregates at the port as a result of the proposals."*

Day Group support this approach. It is essential that there continues to be sufficient protected wharf capacity in order for the draft JAAP to be considered to be in accordance with the National Planning Policy Framework.

Paragraph/Policy/Map no	Policy SH3

Comments:

Draft Policy SH3 states that:

> *"Prior to sites coming forward for redevelopment to alternative uses, planning permissions for continuation of current employment uses may be granted for temporary periods on a case-by-case basis."*

Day Group support this Policy. Temporary consents have allowed Day Group to make temporary use of a site, unsuitable for many others. The proximity of the site to the functional port has provided sustainability benefits in reducing minerals transportation for bagging further afield. The use of the site has created employment opportunities and has contributed to meeting a need for aggregates in the County.

Paragraph 4.7.51 of the draft JAAP recognises that the release of sites for redevelopment to alternative uses along the Western Harbour Arm is a long term process which requires careful management and will rely on working in collaboration with landowners and businesses.

Day Group's aim is to relocate closer to the functional port area. However, there has been a lack of suitable sites available for some time. It is hoped that a new site will be found soon but, in the meantime, it is important that the JAAP allows for ongoing temporary consents which can be granted on a case by case basis, to help manage this change.

Where continued use can be made of the wharf facilities (even for a temporary period) it is clearly good planning practice to ensure that this is supported and facilitated. This approach is underpinned by the National Planning Policy Framework requirement, in terms of a presumption in favour of sustainable development and to ensure in plan-making that Plans are sufficiently flexible to adapt to rapid change.

Paragraph/Policy/Map no	

Comments:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

Equal opportunities

Gender				*Please tick one box only*	
Male		Female		Prefer not to say	

Age				*Please tick one box only*	
Under 20		20 to 29		30 to 39	
40 to 49		50 to 59		60 or over	
				Prefer not to say	

Are you retired?				*Please tick one box only*	
Male		Female		Prefer not to say	

Are your day to day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?						*Please tick one box only*	
No		Yes, limited a lot		Yes, limited a little		Prefer not to say	

Ethnicity				*Please tick one box only*	
Asian/Asian British		**Black/Black British**		**Chinese/Other**	
Indian		Black Caribbean		Chinese	
Pakistani		Black African		Other ethnic group	
Bangladeshi		Other Black			
Other Asian					
Mixed parentage or heritage		**White**			
White & Black Caribbean		White British			
White & Black African		White Irish			
White & Asian		Other White			
Other mixed parentage				Prefer not to say	

Thank you for completing this form

Please return completed forms to: email: consultation@shorehamharbour.com

All forms must be received by 5pm on 10th February 2017

Shoreham Harbour Regeneration

[redacted] 8 February 2017 at 19:30

To: "consultation@shorehamharbour.com" <consultation@shorehamharbour.com>

I welcome the recognition of Southwick beach for Surfing and other watersports, but in actual fact Surfing takes place at other locations as well (e.g. in the Harbour Arms)
- Plan Objective 8 and policy SH8 should protect and enhance Surfing throughout in the Port area
- I support policy SH7.1 to improve water quality in the Port area.

[redacted]

Lewis & Co Planning
town planning consultants

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W www.lewisplanning.co.uk

Shoreham Harbour Regeneration (Consultation)
Adur & Worthing Councils
Worthing Town Hall
Chapel Road
Worthing
West Sussex
BN11 1HA

8th February 2017

Dear Sir/Madam

Shoreham Harbour Joint Area Action Plan (JAAP) Revised Draft (Dec 2016)
Teco Building Products Wellington Road Portslade BN41 1DN

We write in response to the Shoreham Harbour JAAP on behalf of Teco Building Products who are located in Wellington Road, Portslade. These representations should be read together with those previously submitted by Lewis & Co Planning in April 2014. The development potential of the Teco site has also been discussed with Mike Holford (Brighton & Hove City Council) and Jane Fuller (Shoreham Harbour Regeneration Partnership).

Site Location

The Teco premises are located on the north side of Wellington Road and back onto St Peter's Road to the north. The property contains a series of linked factory buildings which although are currently in use for the manufacturing of building products (Use Class B2) they are reaching the end of their useful life. The site is therefore suitable for redevelopment and can make a significant contribution to the regeneration priorities set out in the JAAP.

Shoreham Harbour JAAP 2016

The Teco buildings are located within Character Area 3 (North Quayside & South Portslade) which is subject to allocation SS2 (a strategic employment/mixed use area). Paragraph 4.3.25 states that much of South Portslade Industrial Estate will be safeguarded for employment generating uses but a number of sites will be released from safeguarding to accommodate mixed use development (business and residential).

The Teco premises are located within Site F which is referred to on page 90 of the JAAP as follows:

"Due to the close proximity to the busy Church Road/Wellington Road junction at the entrance to the port and the close proximity to industrial port operational uses, it is recommended that sites E and F are considered to be longer term (10-15 years) redevelopment opportunities for modern employment space (classes B1, B2 or B8)…….As part of a comprehensive redevelopment, the north side of site F may be appropriate for residential uses (C3) in keeping with the character of St Peter's Road. Development on this site must consider the adjacent primary school and nearby residential dwellings".

Character Area 3 – North Quayside & South Portslade

Policy SH12(9) supports a mix of uses on the Teco site as follows:

The majority of site F is safeguarded for employment uses (B1, B2, and B8). Employment uses must be compatible with adjacent residential development.

a. **Buildings of four to six storeys are generally considered acceptable;**

b. **New buildings should be set back from Wellington Road to extend the proposed green corridor;**

c. **As part of a comprehensive redevelopment, residential (class C3) development is acceptable on the frontage to St Peter's Road, opposite existing residential uses. Development will be limited to two-three storeys, unless a sufficient setback from the pavement is incorporated.**

Response on Behalf of Teco Building Products

Our client welcomes the overall approach proposed in Policy SH12 for a mix of employment and residential uses on the Teco site. However, in order to fully support the strategic allocation, we request that the Area 3 proposals map is amended so that the northern section adjacent to St Peter's Road is allocated solely for residential development (rather than a mix of C3, B1, B2 & B8). This amendment would bring the proposals map in line with the wording of Policy SH12(9).

Moreover, an unambiguous allocation for residential development on the St Peter's Road frontage would help to provide the necessary clarity and site value to deliver the redevelopment of the remainder of the site for employment purposes.

A further advantage is that the site could become available for redevelopment in the short to medium term and would help to meet housing and employment needs without the need for public sector intervention as suggested in paragraph 4.3.28 of the JAAP.

We would welcome the opportunity to discuss the potential of the Teco site further if this would be of assistance.

If you require further information, please Paul Burgess MRTPI on 01273 413700.

Yours faithfully

Lewis & Co Planning

ROBINSON & CO

CHARTERED

TOWN PLANNERS

19, Adur Avenue,
SHOREHAM BY SEA
BN43 5NN
Tel: 01273 252463
[redacted]
Leskrob@gmail.com

Adur Civic Centre
(Shoreham Harbour
Draft JAAP Consultation)
Pond Road
SHOREHAM BY SEA
BN43 5WU

9/2/2017

Dear Sir or Madam,

RE: JAAP FOR SHOREHAM HARBOUR - REVISED DRAFT FOR CONSULTATION

COMMENTS ON BEHALF OF OWNERS OF MACKLEYS WHARF, BASIN ROAD NORTH, ALDRINGTON, PORTSLADE

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 eastern side of the site (350m^2).

Clearly this is a substantial landholding[1] 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). An application to remove the expiry date (BH2014/01064) was approved on 30/5/2014.

On behalf of my clients I have commented on the Development Briefs for Shoreham Harbour and JAAP [2] as they have emerged and they ask you to take the following into account in further work on the JAAP.

Please contact the writer in the first instance if you need further details

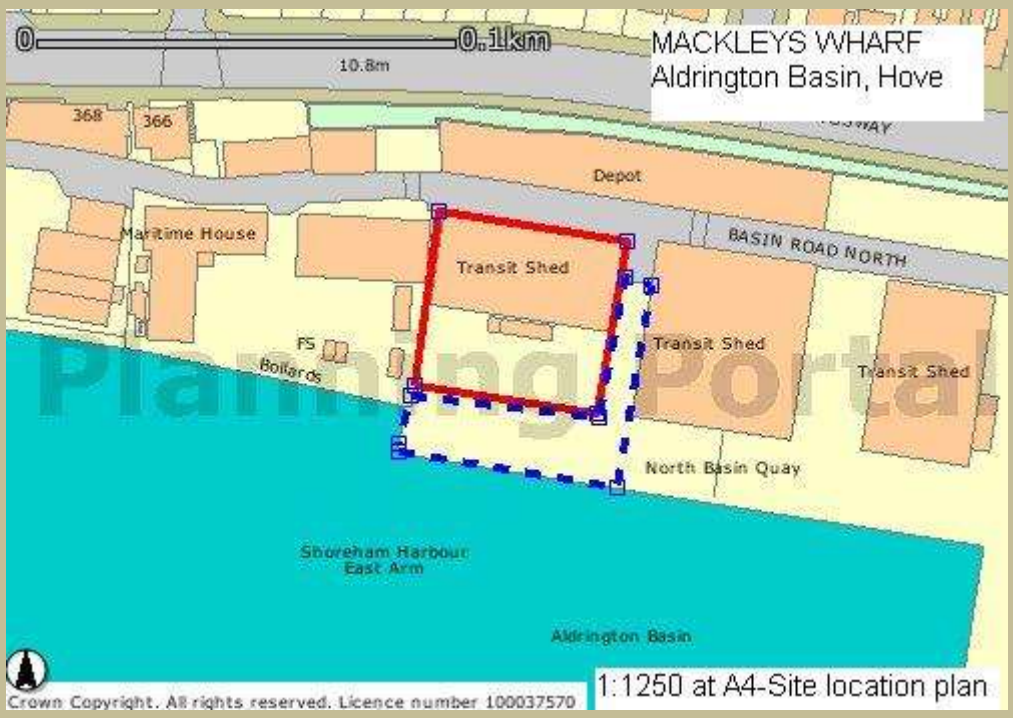
Yours sincerely,

Leslie K Robinson MRTPI

[redacted]

[1] Site plan attached below
[2] See letter dated 24/4/2014 for most recent comments

MACKLEYS WHARF, ALDRINGTON BASIN – LOCATION



Red = 30/5/2014 approval BH2010/01064

Blue outline = other land in same ownership

COMMENTS (8/2/2017) ON THE DRAFT JAAP

ON BEHALF OF HOPEGAR PROPERTIES LTD.

1. Use

1.1. My clients welcome the statement at SS1 / CA2 that the area in which their property is situated will

> '' accommodate a mix of new and improved port operational facilities as well as compatible non-port employment generating floor space (use classes B1, B2 and B8).''

1.2. They are also glad to note the points made in SH 4.1 (p43) and 4.2.5 regarding the relationship between 'existing or proposed employment uses…' and new residential development.

SH4.1 (p43) – Co-location of residential and employment generating uses 1. Residential development in close proximity to existing or proposed employment activities and port uses must be carefully designed and incorporate appropriate mitigation measures to prevent future conflicts arising and maintain the continued operation of business uses. 2. Innovative solutions to mitigation will be encouraged to ensure that residential-led development proposals are capable of existing with neighbouring uses, as well as the long-term development scenario envisaged in the JAAP. 4.2.5 The steep slope down to the basin from Kingsway means the location is able to accommodate land uses and activities that may otherwise harm residential amenity due to noise, smell, dust or other disturbance. Maritime House and Hove Enterprise Centre contribute towards meeting the local demand for affordable, flexible workshop and office space and have high occupation rates.

1.3. They consider that the Port is and is likely to continue to be a suitable location for a variety of employment uses such as the B2 permitted in their building.

2. Road Access to the Port

2.1. Improved road access to the Port was identified as a priority by the Shoreham Port Master Plan (2010). This proposed a new two way link extending Basin Road North to the west and a junction at Church Road.

2.2. SH 11.4 'Transport' says:

> SH 11.4: Transport
> 1. The partnership will work with developers and stakeholders to deliver the package of transport measures for Aldrington Basin as set out in the Shoreham Harbour Transport Strategy. Critical measures include:
> improvements to the following junctions:
> - Wellington Road (A259) – Church Road (A293) – Basin Road North
> - Kingsway/Wellington Road (A259) – Boundary Road/Station Road (B2194) – Basin Road North
> - Upgrade and extension of Basin Road North.

2.3. My clients are glad to note that the JAAP is committed to this new link and junction improvements where it meets the A259 coast road (Map 4).

3. Flood Risk Management

3.1. The draft recognises that there is a continuing risk of tidal surge in the Canal which is not protected by the existing locks. It states:

> SH12.1
> 1. Development proposals must accord with the principles and approach to flood risk management set out in the Shoreham Harbour Flood Risk Management SPD (2012).
> 2. Appropriate SuDS must be included as part of development proposals. Applications should follow the approach set out in the Strategic Flood Risk Assessment

3.2. My clients consider that the JAAP should include a stronger commitment to improving the Lock Gates. It is insufficient, in their view, to refer onwards to the other studies.

3.3. The JAAP should include a commitment to the flood defence measures[3] equivalent to the commitment to the transport strategy, in SH11.4

[3] **FRMG SPD - Brighton version Final Sep 15.pdf**
2.4.16 For Shoreham Port, the strategy seeks to improve the standard of defence by provision of new flood gates, flood walls and pier raising in the area immediately around the lock gates section over the next 20 years.

4. Amenity / Link to Hove Lagoon and Viewing Areas

4.1. Para 2.5.7 of the previous draft mentions breaking down 'the barrier between Hove and Shoreham'.

4.2. Figure 2.3 indicated graphically how a link might be created. The idea of the link is one my clients have supported consistently and they continue to do so.

4.3. The commitment to this link remains in the current JAAP (see 4.2.15) but is weakened by the wording of 4.2.18 which does not mention retail or leisure uses north of Fish.

4.4. While my clients welcome idea of link they ask that the uses north of Fish are reconsidered to make the opening up of views from Hove Lagoon into AB more attractive

4.5. Viewing areas are now as follows: Map 4 shows 'waterfront leisure indicative' close to the junction with Boundary Road/south of site B on map 7.

4.6. Map 7 shows viewing areas adjacent to Sites A and C

4.7. My clients do not consider it is appropriate to extend the viewing areas to north side of Aldrington Basin but welcome the one shown on the east side / north of Fish.

5. Building Heights

5.1. There is extensive reference to high quality design in SH9 / p62.

5.2. Therefore, the restriction of any new development on Aldrington Basin to two or three stories (4.2.31 / p80) is not justified and redundant in light of overall design guidance.

6. Land Use Allocations

6.1. **I**t is not helpful to see the allocation within SS1 and SS2 combined in the JAAP, e.g. SH11.1 and 11.2

6.2. The allocations for each area (South Portslade / Aldrington Basin) should be disaggregated.

6.3. My clients consider that this would allow the aims of the JAAP for each of the different areas to be better understood.

7. Summary

7.1. Hopegar Properties Ltd own a site of approximately 5,300m^2 in Aldrington Basin, see site plan.

7.2. They have commented on each of the earlier drafts of the JAAP and are glad to note that some aspects have now been clarified as requested.

7.3. In particular they note that employment use of the area in which their property is situated is now confirmed. A link road extending Basin Road North is now shown throughout the north side of the enclosed Port between Southwick and Hove with better connections to the A259.

7.4. They do however ask that firmer commitments are made to improved flood risk management; and that the proposed link from Aldrington Basin towards Hove Lagoon is made more attractive.

7.5. They continue to resist viewing areas in locations which they consider inappropriate.

7.6. They consider that the height limitation on new development in Aldrington Basin is not justified.

7.7. They also ask that the land use allocations for South Portslade and Aldrington Basin are disaggregated.

Gmail by Google

[redacted]

Shoreham Harbour Regeneration Project

[redacted] 9 February 2017 at 16:40

To: consultation@shorehamharbour.com

[redacted]

I'm writing in response to the above consultation.
As a regular user of the Shoreham Harbour area, both for walking and at sea, there are several parts of the plan that I think are a good idea. I welcome the recognition of Southwick beach for surfing and other watersports, such as kayaking, however part of the leisure attraction of this area is that these activities take place at other locations as well, such as adjacent to the east and west Harbour Arms and from Kingston Beach.

Therefore, I think, plan objective 8 and policy SH8 should protect and enhance surfing and kayaking (non-motorised watersports) throughout in the Port area. I also support policy SH7.1 to improve water quality in the Port area. I agree with policy SH 13 that Portslade and Southwick beaches be protected for use by local people and that a priority is given to enhancing the vegetated shingle habitat and corridor at the back of these beaches. It is also important, for flood defences, to monitor the extraction of shingle off-shore and its impact on increased erosion on Southwick Beach in particular.
SH15 and 13 promote upgrading of public facilities. Consideration should be given to installation of public beach showers at Carats and at Kingston Beaches, as part of improving facilities for leisure users. I also agree that measures are needed to ensure the natural environment of the harbour mouth area is maintained and improved, drawing on advice from Natural England and expert organisations such as the RSPB (who are stakeholders in the Adur estuary area).

Best wishes

[redacted]

Shoreham Harbour Regeneration Team

SURREY
COUNTY COUNCIL

Minerals and Waste Planning Policy

County Hall
Penryhn Road
Kingston Upon Thames
Surrey
KT1 2DN

9 February 2017

planning.consultations@surreycc.gov.uk

Dear Sir/Madam

Shoreham Harbour Joint Area Action Plan

Thank you for consulting Surrey County Council.

As the minerals & waste planning authority we support the proposals to maintain wharf capacity at Shoreham Harbour in accordance with the emerging West Sussex Joint Minerals Local Plan.

As the supply of land won aggregates in the south east becomes increasingly constrained it is important that infrastructure for the importation of alternative aggregate supplies, including marine dredged aggregates, is maintained and able to meet increased demand across the sub-region as a whole.

Yours faithfully,

Paul Sanderson

Minerals and Waste Policy Team Manager

Response to consultation on Shoreham Harbour Regeneration Project

[redacted] 9 February 2017 at 13:44

To: consultation <consultation@shorehamharbour.com>
Cc: sasinbrighton <sasinbrighton@gmail.com>

Hi,

I would like to make the following comments regarding the use of Shoreham Harbour as a widely recognised and much valued surfing location. The harbour provides the relatively rare phenomenom on the south coast of England of a variety of surf breaks which are sheltered from prevailing south westerly winds, making it possible for local surfers and other watersports enthusiasts to surf south westerly swells which would otherwise not be surf'able on main exposed beaches. Please please make provision in your plans to maintain this valuable local resource which provides recreational use for a wide range of watersports enthusiasts.

In particular I would like to make the following points:

- I welcome the recognition of Southwick beach for surfing and other watersports, but in actual fact surfing takes place at other locations as well (e.g. within the Harbour Arms with surf breaks located at each small beach the on west and east sides, and also along the wall at Soldiers Point)
- Plan Objective 8 and policy SH8 should protect and enhance surfing throughout in the Port area
- I support policy SH7.1 to improve water quality in the Port area.

Many thanks,

[redacted]

Points for consultation on Shoreham port regeneration

[redacted] 9 February 2017 at 14:37

To: consultation@shorehamharbour.com

Hello,
As a surfer who regularly surfs both inside and and on beaches adjacent to Shoreham Harbour I welcome the recognition of Southwick beach for surfing and other watersports. Please could the consultation also note that surfing takes place at other locations in the harbour (e.g. in the Harbour Arms to the east side of the harbour, alongside the wall beneath the coastal watch hut, and on the beach within the eastern side of the harbour accessed from Shoreham fort). These are all recognised surf breaks that have been used by local and traveling surfers for decades and as such provide a valuable recreational resource. I would hope that these areas would be preserved in the regeneration plan for future generations of surfers. Surfers using these locations also support local businesses (shops and cafes).

So I would wish that Plan Objective 8 and policy SH8 should protect and enhance surfing throughout in the Port area

I would also support policy SH7.1 to improve water quality in the Port area.

Thanks and best wishes

[redacted]

SHOREHAM HARBOUR JOINT AREA ACTION PLAN

Revised Draft for consultation December 2016

Comments by the Wiggonholt Association
(registered charity 1129002)

10 February 2017

Summary

1. The Shoreham Harbour JAAP purports to safeguard minerals wharf capacity for the vital importation of aggregates, both marine-dredged and crushed rock (paragraph 1.4.3) but is bound to fail to achieve this. The Draft Plan is not fit for this very significant purpose. It:

– contains no policy on safeguarding (e.g. in Policy SH2 on Shoreham Port);
– proposes no method of achieving the intention (paragraph 3.2.18 is only aspirational, stating that "The regeneration partnership is exploring how best to deliver the safeguarding sites policies at Shoreham Harbour to protect the overall wharfage capacity at the port…");
– identifies no sites at all for this purpose and gives no credible assurance that any sites are available to replace existing wharf capacity lost to 'regeneration';
– plans the release for housing of previously safeguarded minerals wharfs; and
– prioritises 'regeneration' over the public interest in essential aggregates supplies.

The Draft Plan should be withdrawn until effective policies and land allocations are in place to guarantee the continued capacity for landing aggregates at Shoreham Harbour, noting that requirements are likely to increase rather than decrease in the years ahead.

The Wiggonholt Association

2. The Wiggonholt Association is an environmental charity which has been concerned with the supply of aggregates and other minerals for more than 20 years. We have followed the course of marine-dredged aggregate from the time when it was not regarded as part of the apportionment figure for sand and gravel to the present time when it has grown, and is growing, in significance as an alternative to land won aggregate. Overall this is a desirable trend, as the Minerals Planning Authorities are searching for alternative ways of meeting need in view of the shortage of land-won sources of sharp sand & gravel and that soft sand in West Sussex is largely constrained within the South Downs National Park.

Why minerals wharf capacity at Shoreham Harbour matters

3. Paragraph 3.2.13 of the Draft Plan correctly states that "Minerals wharf capacity at Shoreham Harbour makes a significant contribution to meeting the needs for aggregates imports in to the sub-region." The next paragraph correctly highlights the policy in paragraph 143 of the NPPF on the importance of safeguarding such capacity. The supply of land-won sharp sand and gravel in both East and West Sussex is tiny in relation to the demand for this material: in West Sussex supply is around just 10,000 tonnes annually. In contrast, landings of marine-dredged sand and gravel have averaged nearly 1mtpa in the

last 10 years and could rise above 1.2mt. Shoreham Harbour is the only location left in West Sussex where marine-dredged aggregates are currently landed, so any shortfall in wharf capacity would have dramatic impacts. Not only would marine-dredged materials decline, but the option of landing crushed rock brought by sea as an alternative would also be affected (currently up to about 150,000 tpa), while local land-won sources are largely exhausted. Securing essential aggregates for the construction industry would therefore depend increasingly on sources of supply outside Sussex, together with the likelihood of significant increases in haulage of aggregates along Sussex's roads from outside the sub-region (as well as increased throughput, if practicable, at local rail depots).

4. Soft sand supply from land-won sources in West Sussex is much higher than for sharp sand (around 350,000tpa), but finding supplies of this material is becoming increasingly problematic. As land-won sources in line with policy are worked out, which is now clearly foreseeable, a realistic option will be to dredge soft sand from the seabed in the English Channel. These deposits exist but are not yet licensed. They could be brought on-stream in around 5-10 years, but their use obviously depends on suitable south coast ports at which to land them, notably Shoreham Harbour. There is a real risk that failure to maintain sufficient wharf capacity at Shoreham Harbour will increase the pressure for land-won soft sand working within the South Downs National Park and in very sensitive locations nearby. This should be entirely avoidable.

5. The need for wharf capacity is clearly more likely to rise than to fall. The purpose of planning is to look many years ahead to foreseeable future needs, and to ensure that the infrastructure is in place to enable such needs to be met. The Local Aggregates Assessment for the East Sussex area is reported in the Draft Plan at paragraph 3.2.16 as indicating "that the use of marine-won aggregates in the area is greater than previously thought. The implication is that maintaining sufficient wharf capacity at Shoreham Harbour will be important in order to maintain the supply of aggregates" and there is a similar position in West Sussex. Shoreham Harbour holds a highly significant position in the supply of construction aggregates to the sub-region, and it is essential that this is not only recognised but acted upon in the Shoreham Harbour JAAP. The consequences of failure to do so would be potentially highly damaging to the local economy and environment. Aggregates wharfs have public benefits out of all proportion to the rents and land values they generate, so there is reliance on the public sector and specifically plans like this JAAP to assert the primacy of this use when challenged by profitable but subsidiary uses such as housing and marinas.

<u>The vision for Shoreham Harbour</u>

6. Section 2.1 of the Draft Plan sets out its vision. It is that:

> "By 2031, 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."

7. Put another way, port-related activities will be secondary in much of the Harbour. The reference to 'mixed-use developments' cannot possibly include aggregates wharfs as these are bad neighbours to residential and leisure activities (they are round-the-clock activities reflecting the tides rather than normal working hours, and are noisy and well-lit). The extension of the kinds of activity proposed in the Draft Plan are likely to be incompatible with existing and future aggregates wharfs, with foreseeable complaints from neighbours making industrial operations increasingly difficult. The Draft Plan should guard against this by stating a clear strategy for accommodating aggregates wharfs.

8. We have no reason in principle to resist the intention of the Plan broadly to focus industrial activity in the Eastern Harbour and residential use in the Western Arm. However, this depends in practice on ensuring that there is sufficient space available for aggregates wharfs in the east, including to replace capacity lost in the Western Arm, and that this is guaranteed for the very long term. Not only must the available capacity be satisfactory quantitatively, but it must also be satisfactory in terms of vehicular access to roads for onward transportation, frontage to berths with a sufficient length and draught for current and likely future dredgers and for vessels from rock superquarries, and avoidance of inappropriate neighbouring uses. In addition to these basic planning requirements the industry must have a realistic prospect of acquiring sites by purchase or on long leases. This will additionally encourage the construction of new dredgers to renew an ageing dredger fleet, and help to stabilise the industry's future. There must be freedom from the fear of short-term commitments only to aggregates operations, and the risks this poses to continuity of operations and efficiency in the industry. No provision appears to have been made in the Draft Plan to meet any of these requirements, even the basic ones.

<u>The failure of wharf safeguarding at Shoreham Harbour</u>

9. The aspirational words in the Shoreham Harbour Draft JAAP fall greatly short of the commitment needed to safeguard aggregates wharfs. The minerals planning authorities' Plans for the area are broadly carrying forward historic commitments in principle to safeguard wharfs. However, these are demonstrably weak.

10. The West Sussex Minerals Local Plan adopted in July 2003 safeguards five specific wharf sites at Shoreham Harbour. It is instructive to see what has happened to these.

(a) Brighton Power Station 'A' Wharf (now ARC Wharf) and the adjacent RMC Roadstone Wharf (now Rombus Wharf). ARC Wharf is in use, but Rombus Wharf has been lost to another storage use instead of being properly safeguarded. The December 2016 West Sussex Joint MLP has downgraded the safeguarding of Rombus Wharf (dotted not firm lines in the Inset 3 map).

(b) Halls Wharf is safeguarded and the western part of it is in use for aggregates landing.

(c) Turberville (and Penney's) Wharf is safeguarded and in use for aggregates landing.

(d) Kingston Wharf. At the time of the 2003 Plan this was owned by the Shoreham Port Authority. However, this site has been sold by the Authority to a housing developer, contrary to safeguarding policy, and the lease to Day Aggregates has only one year to run. Day Aggregates has no current interest in any other land in Shoreham Harbour so far as we are aware. The safeguarding policy has failed. This is an especially egregious loss:

– Kingston Wharf has direct access to the A259 and the major road network;
– it is located close to the harbour entrance, well away from the principal area of residential development further west down the Western Arm, and did not need to be released;
– the contribution of Day Aggregates to supply seems likely to be lost, with unknown consequences;
– we have no evidence that there has been provision to make good this loss by additional capacity in the Eastern Harbour or by any other means.
– the practical guardian of the safeguarding policy, the Port Authority, has been the agent of the loss, suggesting that no trust can be placed in the Port Authority's management of the issue and that far more stringent practical safeguarding measures are needed.

(e) Free Wharf (including New Wharf). The position here is similar to Kingston Wharf, also adjacent to the A259. The bulk of the site is expected to be developed for housing by Southern Housing Group and has already been cleared. Kendals run a temporary aggregates operation on the New Wharf part of the safeguarded site to the east, but their lease extends only to 2019. Given the site's proximity to a new housing development, continuation of this site will be challenging even if an extension to the lease is forthcoming. Kendals too have no current interest in any other land in Shoreham Harbour so far as we are aware, and the loss of capacity again looms. Once more, safeguarding has failed, and none of the measures in place to address the pressures of alternative lucrative development seem to have worked.

11. The Proposed Draft West Sussex Joint MLP January 2017 identifies the New Wharf site as a safeguarded area, effectively accepting that the Free Wharf site has been lost. Kingston Wharf is retained as safeguarded. Both sites are now accepted as 'temporary' (even though they were apparently 'permanent' in 2003), but in reality both will be lost to aggregates working before the MLP is adopted. No new sites are safeguarded instead.

12. The Shoreham Harbour Draft JAAP states that "There are several larger safeguarded sites within the heart of the port operational area that are actively used to discharge aggregates which offer unused capacity and therefore potential to mitigate the loss of wharves elsewhere in the port" (paragraph 3.2.19). However, these sites appear inaccessible to the two operating companies to be displaced, and there is no assurance that existing businesses will increase their activity levels to compensate, whether for operational or investment reasons. There is a clear need for a far more copper-bottomed arrangement to ensure that wharf capacity remains available – not simply a hope that it will be.

Policy approach in the Shoreham Harbour Draft JAAP

13. The Draft Plan contains no specific policies to remedy the difficulties we have highlighted. The obvious place for this, in 'Policy SH2 Shoreham Port' immediately after the main discussion of 'Minerals Wharfs' (paragraphs 3.2.13-24), is silent on the matter. The Draft Plan has no idea about how it will implement its intention to safeguard aggregates wharfs. Paragraph 3.2.18 states simply its emerging aspirational approach that:

> "The regeneration partnership is exploring how best to deliver the safeguarded sites policies at Shoreham Harbour to protect the overall wharfage capacity at the port whilst maintaining flexibility over which sites can contribute to meet aggregate needs."

In our view, this is wholly inadequate to achieve the objective stated in paragraph 1.4.3 that the JAAP will "will support the safeguarding of the important function of Shoreham Port, including the importing and handling of aggregates and minerals".

14. The Draft Plan identifies no new site as an aggregates wharf. None of the Character Area Proposals mention the opportunities for additional or replacement aggregates wharfs. Meanwhile, the South Portslade Industrial Estate and Aldrington Basin Development Brief adopted by Brighton & Hove City Council in September 2013 proposes the development of Ferry Wharf, but this is subject to suitable mineral wharf capacity being identified in Shoreham Harbour to replace it: where will this be found? The reality is that the 'no net loss' policy is not working and is insufficient to achieve the Plan's stated objective for aggregates wharf capacity.

15. Furthermore, this finding undermines the credibility of the Statement of Common Ground between the relevant authorities, agreed as recently as August 2016. In the light of proposals to redevelop Free Wharf and Kingston Wharf, its paragraph 6.11 states:

> "These sites would not cease to be safeguarded until the adoption of the new West Sussex Minerals Local Plan, however once published, applications will be considered against policies in the Submission Draft JMLP. Those seeking to re-develop existing safeguarded wharves will be expected to provide evidence that there is sufficient capacity elsewhere to accommodate any loss of capacity on the site in question."

Given that it is the Port Authority itself which is seeking redevelopment, and that it cannot demonstrate how capacity will be made available elsewhere, the only conclusion we can reach is that redevelopment of aggregates wharfs takes priority over safeguarding policy and that aggregates supply is being put at risk. The local planning authorities for their part appear to have taken quite insufficient action to use their planning powers to prevent this happening. The implication is that they too find short term gain from housing redevelopment preferable to the wider public interest in aggregates landings. All relevant parties are therefore culpable, and the NPPF paragraph 143 is not being implemented. The Shoreham Harbour Draft JAAP is not fit for the purpose of aggregates wharf safeguarding.

[redacted]

The Wiggonholt Association (Company Limited by Guarantee)
The Old Rectory
Wiggonholt

Pulborough RH20 2EL [redacted]

Draft Joint Area Action Plan
Public Consultation
16th December 2016 to 10th February 2017

Please review the Draft Shoreham Harbour Joint Area Action Plan 2016 before filling in this form. The plan is available at local council offices and libraries or online at:
www.adur-worthing.gov.uk/shoreham-harbour-regeneration/consultation

Please note:

- This form is only for representations on the Shoreham Harbour Joint Area Action Plan.
- Please do not use this form to comment on specific planning applications.
- If you wish to comment on the proposed development by Southern Housing Group at Free Wharf, please visit: www.freewharf.info
  Adur District Council has not yet received a planning application for this site, representations received during consultation on the Joint Area Action Plan cannot be considered when determining a later planning application.

Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:			
Your name	[redacted]		
Organisation *(if applicable)*	The Wiggonholt Association		
Address	The Old Rectory, Wiggonholt		
	Pulborough		
		Postcode	RH20 2EL
Phone Number	[redacted]		
E-mail Address	[redacted]		

Your agent's contact details: *(if applicable)*			
Agent's name			
Organisation *(if applicable)*			
Address			
		Postcode	
Phone Number			
E-mail Address			

Where do you live?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	x
Please specify if 'other'	Wiggonholt (Pulborough)				

Where do you work?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	x
Please specify if 'other'	Wiggonholt (Pulborough)				

Where did you find out about this consultation?					*Please tick one box only*
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			x
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)*											*Please tick one box only*
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)*											*Please tick one box only*
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: See accompanying representation	

Commented [J1]:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

Equal opportunities

Gender					*Please tick one box only*
Male		Female	x	Prefer not to say	

Age					*Please tick one box only*
Under 20		20 to 29		30 to 39	
40 to 49		50 to 59		60 or over	
				Prefer not to say	x

Are you retired?					*Please tick one box only*
Male		Female		Prefer not to say	x

Are your day to day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?							*Please tick one box only*
No		Yes, limited a lot		Yes, limited a little		Prefer not to say	x

Ethnicity					*Please tick one box only*
Asian/Asian British		**Black/Black British**		**Chinese/Other**	
Indian		Black Caribbean		Chinese	
Pakistani		Black African		Other ethnic group	
Bangladeshi		Other Black			
Other Asian					
Mixed parentage or heritage		**White**			
White & Black Caribbean		White British			
White & Black African		White Irish			
White & Asian		Other White			
Other mixed parentage				Prefer not to say	x

Thank you for completing this form

Please return completed forms to: email: consultation@shorehamharbour.com

All forms must be received by 5pm on 10th February 2017

Gmail by Google

[redacted]

Shoreham Harbour JAAP

[redacted]

Dear Sir/Madam

As a partner in the preparation of the Shoreham Harbour Joint Area Action Plan (JAAP) we support its approach to identify a set of realistic, deliverable, locally supported and sustainable proposals for Shoreham Harbour and to manage the impacts of development over time.

The County Council will continue to work with Adur District Council and Brighton & Hove City Council, as well as the Shoreham Port Authority to move the plan forward to adoption.

Kind regards

Caroline West

Caroline West MSc MRTPI | Principal Planning Officer, Strategic Planning,

Economy, Planning & Place Directorate, West Sussex County Council
Location: Ground Floor, Northleigh, County Hall, Chichester, PO19 1RH

[redacted]

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The Brighton Society
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t: 01273 509209 info@brighton-society.org.uk www.brighton-society.org.uk
Member of Civic Voice. Registered charity no. 271138 *Winners 'Civic Voice Website of the Year (2010)'*

13 February 2017

Chris Jones
Principal Planning Officer
Shoreham Harbour Regeneration Partnership

Dear Chris,

Brighton Society comments - Public Consultation on Revised Draft JAAP for Shoreham Harbour

Thank you for meeting us last Monday to discuss aspects of the Draft JAAP, and for giving us a a slightly extended deadline in order for us to complete our comments on the Revised Draft following our meeting.

In general terms we strongly support the intentions of the Plan to create a development framework for an important stretch of the south coast between Brighton and Shoreham. In many ways this is currently an unattractive section of coastline, but with imaginative and sympathetic development of its beachfront and harbour areas could be an extremely attractive area in which to live and work. We consider that it could also make a major contribution to the improvement of the harbour and seafront - not only in terms of its development potential - but also to improve the public access and amenities to its harbour and beachfront areas. This would benefit not only those who will live and work there but also the many people who live near and visit this part of the south coast.

1. General comment - Vision Statement

Section 2 sets out the vision for Shoreham Harbour. Objective 8 sets out the vision for Recreation and Leisure and Objective 9 is to promote high design quality and improve townscape.

We would like to see these important objectives carried through into the sections dealing with the seven character areas. When it comes to dealing with these areas these objective headings have not been mentioned. Specific suggestions for these are set out in the following paragraphs:

2. Aldrington Basin

2.1 **Relationship between Hove Lagoon and Western end of Aldrington Basin**

Paras 4.2.12 – 4.2.16 propose ways in which the connections with Hove Lagoon and Hove seafront could be improved, and this is indicated in very general terms on Map 7.

We agree with the general intentions of these paragraphs but consider that they need to include more "vision" if any real improvements to the relationship between Hove Lagoon and the eastern end of the harbour are to be achieved.

In our previous responses in 2013 and 2014 to the Shoreham Harbour Development Brief and Draft JAAP, we suggested that the small strip of land between Hove Lagoon and Aldrington Basin could be opened up to form a public open space with views both towards Hove Lagoon to the east and the harbour to the west, and act as a transitional area between the recreational use of Hove Lagoon and and the more commercial uses associated with Aldrington Basin.

We are aware that in order to achieve this there are two main obstacles:

(i) Basin Road South which intersects the two areas;
(ii) The land between the two areas is privately owned and not owned by the Harbour Authority.

The first of these problems could well be solved in ways set out in para 4.2.15 – *"this connection could be achieved through the development of pathways and crossings to achieve direct, safe access."* We agree that a safe crossing point on Basin Road South could be achieved by a combination of adequate signage and sensitive road landscaping design.

The second problem is more difficult and would have to be resolved in the longer term, but since this Plan is intended to set out the desired form of Harbour development up to 2031, we think it should be included in the Plan at this stage.

Fig 1.View looking west into Aldrington Basin

Fig.2 Existing view from Hove Lagoon

We understand that the area between the Basin and Hove Lagoon will provide "Employment priority redevelopment opportunities", and para 4.2.28 states, *"Opportunities to develop the under-used sites to the north of Newhaven & Brighton Fish Sales for modern fit-for-purpose employment space will be encouraged"* . We do not disagree with this – the question is, "what form of employment opportunities would be the most suitable?" Part of the area concerned (which is only the relatively small area shown Map 7), is currently used as a builder's and scaffolder's yard, and access for the public between Basin Road South and the harbour edge is not currently possible.

We think there is an opportunity here to define a future public open space overlooking the harbour and all its visual interest to the west and Hove Lagoon to the east. It could be defined on its northern and southern sides by commercial uses such as cafes and small scale retail uses. Small Stuio type offices, and perhaps some residential uses too could be accommodated on the upper levels to bring life and trade to the area. The existing Fish Sales building immediately to the south could also form an integral part of the scheme.

The important element which we strongly feel should be specifically mentioned in the Plan is for "***an open space***" as the essential component of the policy set out in para 4.2.28.

The new public space would need to be attractively landscaped and paved, with seats overlooking the harbour and Hove Lagoon, as well as outdoor seating areas associated with the café/restaurant uses.

The whole area could then be strongly linked via a safe and prominent crossing point on Basin Road South with the recreational uses associated with Hove Lagoon.

Some soft landscaping improvements to remove part of the existing hedge on the east side of Basin Road together with improvements to the adjacent pathways and pedestrian and cycle routes would also be required on the Hove Lagoon side.

This public open space should be defined as such on Map 7.

In order to facilitate the development of this area, the existing commercial uses could be encouraged to re-locate, by including measures in the Plan to provide alternative sites elsewhere in Harbour area for the organisations concerned.

We believe that the potential attractions of this proposal - were it to be clearly defined in the Harbour Development Plan - would encourage private enterprise to develop the area along the lines described. There are countless examples throughout the world of former derelict or run down port waterside areas being transformed into attractive public spaces incorporating a wide range of popular and sustainable public facilities.

This represents a real opportunity to create a strong physical and visual link between the western end of the Brighton and Hove seafront with the eastern part of Shoreham Harbour.

2.2 **Northern side of Aldrington Basin and the harbour**

The JAAP lists the main objectives for land use around Aldrington Basin 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 Plan should be considering the long term potential for this valuable stretch of the harbour.

It is disappointing that the north side of the Aldrington Basin is to remain as commercial/industrial use but we would still encourage you to consider the possibility that some residential uses could be included in this area on the upper levels of suitable commercial floor space in this specific area.

It seems to us that as much potential residential uses should be provided for in

the JAAP, given the limited land available for housing south of the South Downs National Park and more imaginative thinking could achieve this in some situations. CPRE has advocated that residential uses could be created on upper floors above car parks, retail parks and brownfield commercial sites. Why could this not be provided above single-storey commercial premises along this stretch of prime harbourfront with prime views overlooking the harbour?

There would appear to be opportunities 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.

Further to the west, 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. (Fig 3)

Fig. 3

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 4 and 5 below.

Fig. 4

Fig. 5

Even the small marinas cannot be accessed as they again have high security fencing. (Fig 6). 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.

Fig.6

We consider that this area could be improved by providing some access along the waterfront for pedestrians and perhaps cycles. Even a narrow path along the edge of the north side of the harbour would bring a significant improvement in the environment. A continuation of the cycle and pedestrian access routes (which are proposed in areas further west), into this area would bring significant improvements to its appearance as well as providing a safe and pleasant way for people to see the harbour. This idea appears to be supported by Map 7 where a potential viewpoint is shown on the north side of the basin.

3. Portslade and Southwick Beaches (Section 4.4)

We strongly support the general policies to improve the pedestrian and cycleways of Monarch's Way and the National Cycle Network as set out in this section. However we feel that as currently expressed, it merely pays lip service to improving these nationally important pedestrian and cycle routes, and the adjacent beachfront areas.

3.1 **Basin Road South and the beachfront**
The currently appallingly unfriendly and unsightly pedestrian and cycle route behind the Esplanade housing to the western end of Basin Road South, could be much improved to allow both better views of the harbour to the north and the beach to the south, and the recreational value of whole of the seafront between Hove Lagoon andCarat's café at the western end of Basin Road South could be vastly improved.

Fig 7 unfriendly cycle and pedestrian route

Fig. 8 ...unsightly metal fencing

In combination with much needed improvements to the interface between Basin Road south and the beachfront, improvements to the whole of Basin Road South 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 4.4.6 of the Plan admits *"Despite the industrial feel of this route, it remains popular and the beaches are frequented by local families, swimmers, surfers and artists, particularly during the summer months."*

In fact the whole area is visually disastrous, being unkempt, scruffy and unattractive, and access to most of the beach and sea along this stretch of Basin Road South is cut off by an array of rusting metal and concrete walls and wire mesh fencing.

The roadway and pavements are unattractive and unsafe for both pedestrians and cyclists. 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.

Fig 9…scruffy and unsightly appearance

Fig.10 ..separated from the beachfront

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.

Fig. 11 ...beachfront concealed behind a high concrete wall

The Plan states "*Linkages to existing open space assets such as Hove Lagoon, West Hove and Portslade / Southwick Beaches will also be encouraged".*

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.

How are the vaguely expressed policies set out in the Plan going to be realised? How much will be carried out by the local authorities? How much commitment will there be from the Port Authority to improving the whole area? How much will have to be done by private enterprise? How much done by Natural England?

And if there are convincing answers to these questions, in what form will the required improvements be carried out?

We were dismayed when we discussed this with you, to discover that the Port Authority currently owns the beach and apparently had no intention of improving access to it (access to which is completely cut off by the scruffy walls and fences along the this stretch of Basin Road South). Nor were you to able to confirm to us how far on to the beach towards the sea the Port Authority's ownership extends.

The Harbour Development Plan will vastly increase the development potential of the whole area and create thousands of new homes and employment opportunities, leading to a much increased demand for the recreational opportunities offered by the coastal beachfront and harbour areas.

There should be a stated policy contained within the Development Plan to ensure that a proportion of the profits from the development of the Harbour should be used to carry out the much needed improvements to the public domain and facilities in this area.

4. Improvement of the Lock crossing

The current environment for public access across and around the locks is appalling with pathways hemmed in and surrounded by high ugly wire fencing. Access to the impressive scale and engineering qualities of the locks should be encouraged so we would strongly support improvements to the environment of this critical part of the harbour.

5. Historical Assets

The harbour has many important historic assets besides those mentioned in the Plan, and we feel that the JAAP should include a list of ***all*** the important buildings.

The northern edge of the basin includes most of the historic assets of the harbour. 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 historical assets that should be noted in the JAAP are:

Substantial Victorian Warehouses on the Travis Perkins site. Used for storage of substantial quantities of Imported ice during the 19th Century.(Fig 12)

Early 19th Century coastguard cottages and a group of Victorian buildings above Nicholson Wharf.

The Port Authority buildings and the numerous industrial buildings at the locks.

Fig. 12 Victorian warehouses

6. Views across the harbour

6.1 Preservation of the open view across the harbour Southwick/Portslade.

The cliff top view across the harbour from the Portslade/Southwick border to the Lady Bee Marina is an asset that will require tight planning controls. This stretch of the A259 corridor is on relatively high ground and it will be essential to ensure that the open view across the harbour are kept intact. The aim to improve the amenity value of adjacent areas along the north side of the harbour would complement this aim.

Fig. 13 Important views from A259

Other potential viewpoints are shown on the Maps dealing with individual areas of the harbour, but these appear to be indicative only, are not generally discussed in the text, nor appear to have any apparent constraints on any development proposals in the area which might affect them. Definition and protection of important views both down the length of the harbour and across it at key points, need to be considerably strengthened.

7. Definition of Port associated uses and general industrial/employment uses

There does not appear to be any differentiation in the JAAP 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.

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.

For example the strip of land between Hove Lagoon and Aldrington Basin discussed in para 2.1 above is occupied by a scaffolders yard – there would appear to be no reason for this to be situated where it is if an alternative location could be found.

There are many other firms situated on harbour land with no apparent direct links to Port activities where this situation also applies.

8. Height, form and scale of new developments

We generally support the proposals included in the JAAP, particularly in relation to 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. The lack of any Urban Design studies to clarify constraints on tall buildings in other areas of Brighton and Hove has led to problems both for developers who are left to work out their own interpretations of what is acceptable, and for campaigners against tall buildings in inappropriate locations.

We think reference to SPG15 in para 11 on p.93 should be deleted - in its current form SPG15 is a discredited policy and it should not form part of the Shoreham Harbour JAAP.

We do however support the Development form and typology studies set out in para 4.7.69 of the Draft JAAP, and would like to suggest that similar studies should be included for other potential housing sites within the harbour area.

These could be extended to include studies on the proposals for the housing densities envisaged for particular areas, heights of buildings as well as indicative housing mix proposals, all of which would give essential guidance for potential developers.

9. Transportation

There is no mention of the potential role the railway line between Shoreham and Southwick stations where it runs close to the northern boundary of the Harbour area could play in promoting development near these stations. Transport hubs can generate higher residential densities and concentrations of employment opportunities because of their accessibility.

In conclusion we think the Draft JAAP will be a very useful planning tool and sets out clear and much required planning guidance which should assist in creating major improvements to the Shoreham Harbour area. The port has enormous potential to make a vital contribution to an important and up to now neglected stretch of coastline between Brighton and Shoreham, in terms of opportunities for commercial, residential and recreational uses.

The comments we have made in this letter are intended to strengthen the planning guidance in areas where we think it needs further work and we hope you will consider the points we have made in that light.

Yours faithfully,

13 February 2017

Shoreham Harbour Regeneration
Adur District Council
Portland House
44 Richmond Road
Worthing
BN11 1HS

Dear Sir/Madam

We apologise for the late response but this has just recently been drawn to our attention. West Sussex FSB Policy Team have concerns about the Shoreham Port Plan which we have voiced before.

As Shoreham is a trust port the trustees have responsibility to act for the benefit of the port and associated harbour, not for any other bodies.

The Infrastructure in South East England is under considerable strain and there is neither the finance nor the space to make the considerable changes needed in many areas.

Alternatives must be sought and the sea and ships are an important option which should be more fully utilised and Shoreham Port is in an ideal position to take advantage of this but so far is failing to do so. Shoreham was the first choice for the Wind Farm but EON felt that Shoreham did not have the space.

While the Trustees might have taken the decision to focus on the East arm and sell land on the West Arm there should be restrictions that ensure it continues to be used for business purposes. Other parts of West Sussex are working extremely hard to attract inward invest investment both from other parts of UK and from overseas. We find it strange that Shoreham and Shoreham Part do not seem to be acting in a similarly strategic way.

Whilst we can understand the Port wanting to concentrate its interests in the East arm and sell off land in the West arm, it should not be done without restrictive covenants preventing the purchasers from using the land for residential remaining port use carrying on its lawful business. purposes. This is still possible under the Permitted Development legislation as Crawley Borough Council has demonstrated in protecting Manor Royal Business Park.

Once land is residential it can never go back to business, let alone port, use and experience in other areas of the county show that residential use and business use do not sit happily side by side so ongoing complaints arise e.g. noise, activity outside 9-5, etc, as well as lack of residential amenities.

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A Press and Parliamentary Office,
2 Catherine Place, Westminster,
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Registered Office:
National Federation of Self Employed and Small Businesses Limited,
Sir Frank Whittle Way, Blackpool Business Park, Blackpool, FY4 2FE

Registered in England: 1263540

Selling the land for residential use does not seem to be fulfilling the Trustees' responsibility for acting to ensure the best future for Shoreham Port or the local economy and we wish to register a strong objection.

Yours sincerely

[redacted]

[redacted]

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Registered in England: 1263540

Shoreham Harbour Regeneration Project.

[redacted] 16 February 2017 at 16:44

To: consultation@shorehamharbour.com

[redacted]

Dear Consultation Team

In response to the proposals for the regeneration of Shoreham Harbour I would like to make the following points:

-I welcome the recognition of Southwick beach for surfing and other watersports, but in actual fact surfing takes place at other locations as well (e.g. in the Harbour Arms)
- Plan Objective 8 and policy SH8 should protect and enhance surfing throughout the Port area
- I would like to express my support for policy SH7.1 to improve water quality in the Port area.

Thanks

[redacted]

Brighton and Hove Cycling Campaign
Bricycles
www.bricycles.org.uk

www.facebook.com/Bricycles
https://twitter.com/Bricycles

2 Glovers Yard,
121 Havelock Road,
Brighton,
BN1 6GN

16 February 2017

Chris Jones,
Principal Planning Officer,
Shoreham Harbour Regeneration Partnership,
Worthing Town Hall, Chapel Road,
Worthing, West Sussex, BN11 1HA

BY EMAIL TO: chris.jones@adur-worthing.gov.uk

Shoreham Harbour Joint Area Action Plan consultation

Dear Chris,

Thank you very much for meeting us on 6 Feb 2017.

On behalf of Bricycles (Brighton and Hove Cycling Campaign) and as a Cycling UK campaigner for Brighton and Hove, I am writing in response to the above consultation.

We welcome the proposals for enhanced pedestrian and cycle paths throughout the regeneration area, and also the delivery of the England Coast Path.

We strongly support a total upgrade of National Cycle Network Route 2 which runs along Wharf Road and Lower Basin Road South. Cyclists are currently sharing these roads with HGVs but this is not a safe arrangement. We look forward to a reduction in HGV movements on the roads as vehicles are differently routed to access the harbour site.

The seafront cycle route from Brighton to Shoreham ends suddenly. Access for westbound cyclists via Wharf Road and Basin Road South is very poor and needs improvement. Possibly some land to the south of Wharf Road could be used to create an east-west cycle track.

It is essential that all cycling infrastructure is built to the highest standards.

Cycling infrastructure should be direct and continuous, with adequate widths. It should not bring cyclists into conflict with pedestrians and motor vehicles. Cyclists and pedestrians should also not have to give way frequently to motor vehicles. Acknowledged standards for infrastructure are described in the London Cycle Design Standards[1], the Manual for Streets[2] and Manual for Streets 2[3]

We support proposals for new and improved walking and cycling routes at the Western Harbour Arm, the Canal lock gates and at Portslade and Southwick Beaches. We support provision of a direct route along the Shoreham

[1] https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2

[2] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/341513/pdfmanforstreets.pdf

[3] https://www.gov.uk/government/publications/manual-for-streets-2

Harbour waterfront along with the green corridor to assist species survival. We strongly support the proposed cycle route along the South Beach and hope it can be co-ordinated among the different property ownerships.

We are very supportive of improvements for cyclists along the A259, which at the moment deters cycling due to the high volume of fast and/or close traffic. We welcome the proposed new cycle route on the southern side of the harbour near the Yacht Club.

We are often concerned to see cyclists encountering very challenging cycling conditions as they mix with HGVs on the A259. This must reduce the potential take up of cycling and limit the numbers of people who can access the very useful and attractive Adur Ferry Bridge.

We would like to ensure that there will be improvements for cycling on all roads and junctions linked to the regeneration area including the A293, A270, B2184 (Boundary Road), A283, A2025 (South Street, Lancing), B2066 (New Church Road, Hove).

We strongly support the proposed pedestrian/cyclist bridge at Dolphin Road. It would offer a useful north-south route over the A259.

We would like to see direct cycling routes to neighbouring areas and good permeability of all streets to enable safe walking and cycling.

We hope to see a much improved arrangement at the lock gates where currently walkers, cyclists and disabled people sometimes wait more than 20 minutes for shipping to pass. We would like all partners such as Shoreham Port Authority to ensure that when the lock gates are upgraded, a crossing is built so that when one end of the lock is open, people can cross at the other without delay.

The route across the lock gates and at all points in the development should be wide enough for tandems, recumbent cycles and tricycles. Path widths should provide enough space so that cyclists and pedestrians do not come into conflict.

“Cyclist dismount” signs should not be necessary as in the present arrangement at the lock gates, or elsewhere in this development.

We are strongly in favour of road traffic reduction and support all measures to achieve this. We support a switch from building roads to instead investing in sustainable transport. In this context, (though outside the scope of this consultation) we do not support moves to upgrade the A27 at enormous cost because this will encourage yet more traffic with all the accompanying problems of poor air quality, car dependence, obesity, community severance, increased carbon emissions, environmental degradation, noise etc. We would like to see region-wide measures to reduce traffic on the A27.

It is essential that the street design of new housing includes high quality safe cycle routes, pavements/walking routes and bus access so as to minimise the dependence on the private motor vehicle. Parking standards should not be exceeded (as is being proposed at the nearby New Monks Farm development.)

All junctions should be designed to give safe passage for those on bikes or on foot, ensuring that they have priority over motor vehicles. Cyclists benefit from Advanced Stop Lines and an “early green” phase at traffic lights which let them go first as installed in Brighton and Hove’s Lewes Road.

There should be plenty of secure and covered cycle parking at all destinations, including at businesses, to reduce the need for individual car use.

Brighton and Hove City Council have found an operator for their new Bike Share scheme[4] which will cover central Brighton, the Lewes Road corridor and the seafront commencing in 2017. It would make sense if this scheme could

[4] http://www.brighton-hove.gov.uk/content/press-release/brighton-hoves-new-bike-share-scheme-track-summer

extend further west into the Shoreham area. A cycle repair shop, South Coast Bikes[5] is conveniently situated at Quayside Buildings, Basin Road South. We support development of a "Cycle Hub".

Given the large scale of this proposed development, it will be important to ensure that cycling does not slip down the list of priorities and become an "add-on" or that proposed cycle improvements simply don't happen.

We are glad to learn that Shoreham Port has a travel plan. We would like to see travel plans to be a requirement of all businesses located in the regeneration area.

We support nationwide "Space for Cycling"[6] campaign which aims to create the conditions where anyone can cycle anywhere.

We hope you will take our points into consideration.

Yours sincerely,

[redacted]

Campaigns Officer & News Editor, Bricycles, the Brighton and Hove Cycling Campaign
www.bricycles.org.uk www.facebook.com/Bricycles and twitter.com/Bricycles
Cycling UK campaigner, Brighton and Hove www.cyclinguk.org/

[5] https://www.southcoastbikes.co.uk/
[6] http://www.cyclinguk.org/campaign/space-for-cycling

Draft Joint Area Action Plan
Public Consultation
16th December 2016 to 10th February 2017

Please review the Draft Shoreham Harbour Joint Area Action Plan 2016 before filling in this form. The plan is available at local council offices and libraries or online at:
www.adur-worthing.gov.uk/shoreham-harbour-regeneration/consultation

Please note:

- This form is only for representations on the Shoreham Harbour Joint Area Action Plan.
- Please do not use this form to comment on specific planning applications.
- If you wish to comment on the proposed development by Southern Housing Group at Free Wharf, please visit: www.freewharf.info
  Adur District Council has not yet received a planning application for this site, representations received during consultation on the Joint Area Action Plan cannot be considered when determining a later planning application.

Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:		
Your name	[redacted]	
Organisation *(if applicable)*		
Address	[redacted]	
		Postcode [redacted]
Phone Number		
E-mail Address		

Your agent's contact details: *(if applicable)*		
Agent's name		
Organisation *(if applicable)*		
Address		
		Postcode
Phone Number		
E-mail Address		

Where do you live?				*Please tick one box only*	
Shoreham-by-Sea		Southwick	x	Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			x
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

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Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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16th December 2016 to 10th February 2017

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Phone Number		
E-mail Address		

Your agent's contact details: *(if applicable)*		
Agent's name		
Organisation *(if applicable)*		
Address		
		Postcode
Phone Number		
E-mail Address		

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	x
Please specify if 'other'		Shoreham Beach			

Where do you work?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	x
Lancing		Worthing		Other	
Please specify if 'other'					

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	x

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: We need more trees. Brighton Road could be lined with trees all the way along. This would help with air pollution and noise from all the traffic.	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

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Very satisfied	x	Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: Great idea. It should include Civic Centre too	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: We really need a main cycle route along the A259 all the way from Brighton to Worthing. We also need lots more routes to connect up. Off road is best so cars won't park on the cycle lane!	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

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Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: We need more housing. But don't forget about green space	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: It's good to see the plans for Shoreham Harbour. The section between the lighthouse and town centre desperately needs improving. Cycle lanes, trees, solar power would be great here. A lot of things have already happened in this area, like the new bridge and the Parcelforce development. The plan could include a summary of these so people know what has already been done.	

Paragraph/Policy/Map no	
Comments: I'm confused as to why Shoreham Fort is included here, when it's also in the Shoreham Beach Neighbourhood Plan. It's cut off from the rest of the harbour, and no	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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Your contact details:			
Your name	[redacted]		
Organisation *(if applicable)*			
Address	[redacted]		
		Postcode	[redacted]
Phone Number			
E-mail Address	[redacted]		

Your agent's contact details: *(if applicable)*			
Agent's name			
Organisation *(if applicable)*			
Address			
		Postcode	
Phone Number			
E-mail Address			

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade	x	Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	x
Please specify if 'other'		London			

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website	x	via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			
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Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**4.3.18**
Comments: I am pleased to see that the redevelopment of this area will keep the green spaces next to Wellington Road. There isn't much green space in this area. If improved these could go a long way to improving the environment. It will protect the flats from the noise and fumes from all the cars on the road. These should be connected up with trees and planting to Vale Park and to Hove Lagoon.	

Paragraph/Policy/Map no	**SH12.3**
Comments: Strongly support the green corridor	

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Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	3.7.14
Comments: I support the green corridor. There isn't enough green space and wildlife. Green space has lots of benefits for health and wellbeing and will help make the city more attractive and sustainable.	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

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Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: seems like a good idea	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	x

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	x

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: What is the council doing about improving the rest of South Portslade. The industrial estate is very run down.	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
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Your contact details:		
Your name	[redacted]	
Organisation *(if applicable)*	Surfers Against Sewage	
Address	[redacted]	
		Postcode [redacted]
Phone Number	[redacted]	
E-mail Address	[redacted]	

Your agent's contact details: *(if applicable)*		
Agent's name		
Organisation *(if applicable)*		
Address		
		Postcode
Phone Number		
E-mail Address		

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	x
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?					*Please tick one box only*
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Where did you find out about this consultation? *Please tick one box only*					
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local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			x
Other - please specify					

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Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

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Paragraph/Policy/Map no	
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Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: Green infrastructure should be designed to achieve multiple benefits including reducing flooding and improving water quality	

Paragraph/Policy/Map no	Plan Objective 8
Comments: You welcome the recognition of Southwick beach for surfing and other watersports, but in actual fact surfing takes place at other locations as well (e.g. 3 places in the Harbour Arms, near the outfall from the aggregates depot, near the power station outfall) - Plan Objective 8 and policy SH8 should protect and enhance surfing throughout in the Port area - I support policy SH7.1 to improve water quality in the Port area.	

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Paragraph/Policy/Map no	
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Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: Cycle parking should be improved to encourage beach users to cycle more.	

Paragraph/Policy/Map no	
Comments:	

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Paragraph/Policy/Map no	
Comments:	

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Comments:	

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Paragraph/Policy/Map no	
Comments:	

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Comments:	

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Your contact details:			
Your name	Tim Slaney		
Organisation *(if applicable)*	South Downs National Park Authority		
Address	South Downs Centre, North Street, Midhurst		
		Postcode	GU29 9DH
Phone Number	[redacted]		
E-mail Address			

Your agent's contact details: *(if applicable)*			
Agent's name			
Organisation *(if applicable)*			
Address			
		Postcode	
Phone Number			
E-mail Address			

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local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**SS1 & SS2**
Comments: The South Downs National Park Authority welcomes the retention of employment uses and the promotion of mixed use developments.	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	Green Infrastructure
Comments: The South Downs National Park Authority supports the requirement for new green infrastructure.	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	District heating and cooling
Comments: The South Downs National Park Authority supports the requirement for district heating and cooling networks.	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	Pedestrian and cycle networks
Comments: The South Downs National Park Authority supports the development of enhanced pedestrian and cycle paths and in particular the England Coast Path, National Cycle Route 2 and Monarchs Way and the opportunity to improve links to the South Downs Way.	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	Western Harbour Arm
Comments: The South Downs National Park Authority supports the recognition of the importance of the setting of the National Park and that any taller buildings could have an impact on landscape quality and scenic beauty of the National Park.	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	Policy SH3, CA7, para 4.7.50 – 4.7.51 & 5.1.8
Comments: There are numerous references within the AAP to the relocation of existing businesses and where necessary the partnership helping to relocate those businesses within the district, local area or sub-region. Whilst the South Downs National Park Authority recognises the development pressures being experienced and the limited development opportunities in and around the area, it is important that the AAP acknowledges that any relocation assessment work needs to reflect the National Park's purposes and duty (as set out in Section 62 of the Environment Act 1995) and that any proposals for significant relocation to land within the National Park is unlikely to result in success.	

Paragraph/Policy/Map no	Pages 35 - 36
Comments: The South Downs National Park Authority supports the references to the importance of the mineral wharf capacity, safeguarding sites and the statement of common ground.	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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Public Consultation
16th December 2016 to 10th February 2017

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Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:	
Your name	[redacted]
Organisation *(if applicable)*	
Address	[redacted]
	Postcode [redacted]
Phone Number	[redacted]
E-mail Address	[redacted]

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	
	Postcode
Phone Number	
E-mail Address	

Where do you live? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade	x	Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade	x	Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			x
Other - please specify					

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Very satisfied	x	Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**4.3.10**
Comments: The proposed road connecting Basin Road North to the junction with Church Road runs directly adjacent to my home at 20 Wellington Road. There is no more than 5 metres between my home and the warehouse owned by Travis Perkins to the south. Unless one or other of these buildings are demolished it is not viable to route any traffic - let alone heavy goods vehicles - along this route even if it is one way. I, and my neighbours, would fight this proposal at every stage were it to go further: it will damage our quality of life irreparably. I would like clarification about how this is proposed to happen.	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	x	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	x

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	x

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	x

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:			
Your name	[redacted]		
Organisation *(if applicable)*			
Address			
		Postcode	[redacted]
Phone Number			
E-mail Address			

Your agent's contact details: *(if applicable)*			
Agent's name			
Organisation *(if applicable)*			
Address			
		Postcode	
Phone Number			
E-mail Address			

Where do you live? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove	X	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove	X	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			X
Other - please specify					

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied	X	Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map Policy SH1.1 and paras 3.1.15-20	
Comments: Hove Civic Society welcomes the revised policy and congratulates the council on this forward looking and imaginative policy.	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:			
Your name	[redacted]		
Organisation *(if applicable)*	Hyde New Build Limited		
Address	[redacted]		
		Postcode	[redacted]
Phone Number			
E-mail Address			

Your agent's contact details: *(if applicable)*			
Agent's name	Lewis and Co Planning		
Organisation *(if applicable)*			
Address	2 Port Hall Road		
	Brighton		
		Postcode	BN1 5PD
Phone Number	01273 413700		
E-mail Address	luke.carter@lewisplanning.co.uk		

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'	N/A				

Where do you work?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'	Nationally.				

Where did you find out about this consultation?					*Please tick one box only*
via A&W website		via B&HCC website		via WSCC website	
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word of mouth		email/letter from Shoreham Harbour Regeneration			
Other - please specify		Planning Consultant			

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Very satisfied		Satisfied		Neutral		Dissatisfied	✓	Very Dissatisfied		Unsure	

Please add any additional comments below: **(See overleaf).**

Paragraph/Policy/Map no	Policy SH11, Map 7 / Character Area 2

Comments:

For Character Area 2, the area has been subdivided into areas A, B, C, D and E. Only area E is shown as being for mixed use (residential and commercial development). All other areas are shown as being for commercial development only. Such a restriction is overly restrictive, and may prevent future development – which may need some residential development as a form of enabling development. Furthermore, area E may not be large enough to supply the 300 homes envisaged under Policy SH11. Given that modern residential development is subject to National Planning Policy Framework policies that seek to ensure that residential development does not prejudice neighbouring commercial users, any residential development would have to be designed to ensure that both activities can co-exist. An example of this is Maritime House, which has the benefit of a Prior Approval for conversion of some floorspace into residential floorspace.

Policy SH11 (part 4a) is too restrictive with regard to its reference to limiting building heights on "site E" to no greater than the "Vega" apartment building. Site E already includes a site (the "PortZED" site) that benefits from planning permission for a series of apartment buildings that exceed the height of the Vega building – and so the policy as worded is already effectively "out of date".

PROPOSED NORTH ELEVATION

The policy should be re-worded to say that building heights should be justified with regard to analysis of urban design/impact and daylight and sunlight impact.

Policy SH11 (part 4c) refers to development being set back from Kingsway and providing a domestic scale. As above, the PortZED scheme is already edge of pavement – meaning the policy is already effectively "out of date". Furthermore the phrase "domestic scale" is very imprecise: does it refer to bungalows, houses or apartment buildings? As above: if it refers to houses or bungalows, then the extant planning permission on the PortZED site already renders the policy out of date.

Paragraph/Policy/Map no	

Comments:

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Very satisfied		Satisfied		Neutral	✓	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied		Satisfied		Neutral	✓	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied		Satisfied	✓ ✓	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied	✓	Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**SH16 (6)**
Comments: **SH16 (6)** now imposes a general limit on building heights of 5 storeys, with SH16 (7) allowing taller buildings where this can be demonstrated to be appropriate. This is not considered acceptable and will not enable development at a density that makes the best and most efficient use of the land. A minimum height of 5 storeys should be required by this policy with shorter buildings (3-4 Storeys) allowed where this would provide visual relief as appropriate and taller buildings encouraged subject to consideration of the bullet points set out in SH16. This would result in a far more positively worded policy which would better enable the housing needs of the area to be met.	

Paragraph/Policy/Map no	SH16 (9)

Comments: **SH16 (9)** requires all development in the Western Arm to enhance townscape around key linkages wherever appropriate. Of the three key linkages identified, the following comments are made:

Highstreet/Norfolk Bridge/A283 – This junction is west of the area shown on the map in the draft JAAP and would not be visible from any of the land identified for development. It is not understood how improvements to the townscape here could be considered as being "reasonably related" to development of the Western Harbour Arm as an Infrastructure requirement.

Brighton Road/New Road/Surrey Street This junction is adjacent to the former Parcel Force site which is now under construction for a 7 storey mixed use development. It is assumed that in granting planning permission the Council secured via S106 the appropriate infrastructure requirements to make the development acceptable in planning terms. For this reason, there should not be any need for further improvements to this area of Townscape to be provided by others seeking to develop other sites on the Western Harbour Arm.

Brighton Road/Ham Road There is no junction between Ham Road and Brighton Road (A259). The junction opposite the Adur Civic Centre/Humphreys Gap is the Junction of Eastern Avenue and Brighton Road**.**

All sites. The location of the three symbols on the JAAP maps which indicate Junction Improvements (page 117) do not relate to the 3 junctions set out in the text.

It is suggested that this draft policy is amended to require development to enhance townscape and public open space in the vicinity of the development, and/or to provide new public spaces within the application site where appropriate. (However this might already be covered in part by criterion 4)

Paragraph/Policy/Map no	SH16 (10 & 11)

Comments: **SH16 (10)** requires an 8m setback from harbour wall to buildings to enable the delivery of a new waterfront route.

8m is an excessive requirement that will make development of the narrower section (eastern end) potentially unviable if imposed universally. While 8m is reasonable as a guide, this could narrow in places to 4m and still provide an adequate cycle/pedestrian route. It is suggested that this minimum distance of 8m should be applied flexibly where the developer can demonstrate a constructional, operational or planning need to provide a narrower section of walkway.

The Policy should also clarify whether overhanging balconies which breach the 8m (or narrower) setback will be allowed above ground floor level.

SH16 (11) requires development to be setback "as far as possible" from the A259. This is imprecise and subjective and will create uncertainty for developers and the LPA. The policy should be amended to require developments to demonstrate that occupiers will be adequately protected from noise and air quality. The requirement for the building's setback to be appropriate to mitigate against a canyoning effect will be covered by other design policies in the Local Plan which allow for a more sophisticated consideration of building heights, articulation, boundary treatments, materials and setback from the highway to be considered in combination when assessing the potential "canyon effect" of a development.

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	**Allocations SS1, SS2, SS3 and SS4**
Comments: The plan is quite confusing in that it has a reference to site allocations SS1, 2, 3 and 4, but does not then actually have plan policies with the same references. Rather character appraisals then incorporate some of the "SS1, 2, 3 and 4 objectives. This is very confusing and the Plan should be re-referenced / drafted to avoid such confusion.	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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Public Consultation
16th December 2016 to 10th February 2017

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Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:			
Your name	[redacted]		
Organisation *(if applicable)*	Harbour View Developments (Sussex) Ltd		
Address	[redacted]	Postcode	[redacted]
Phone Number			
E-mail Address			

Your agent's contact details: *(if applicable)*			
Agent's name	Lewis and Co Planning		
Organisation *(if applicable)*			
Address	2 Port Hall Road Brighton	Postcode	BN1 5PD
Phone Number	01273 413700		
E-mail Address	Simon.bareham@lewisplanning.co.uk		

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		Hassocks			

Where do you work?					*Please tick one box only*
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Portslade	✓	Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where did you find out about this consultation?					*Please tick one box only*
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth	✓	email/letter from Shoreham Harbour Regeneration			
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)*											*Please tick one box only*
Very satisfied		Satisfied		Neutral		Dissatisfied	✓	Very Dissatisfied		Unsure	

Please add any additional comments below: **(See overleaf).**

Paragraph/Policy/Map no	Policy SH11, Map 7 / Character Area 2

Comments:

For Character Area 2, the area has been subdivided into areas A, B, C, D and E. Only area E is shown as being for mixed use (residential and commercial development). All other areas are shown as being for commercial development only. Such a restriction is overly restrictive, and may prevent future development – which may need some residential development as a form of enabling development. Furthermore, area E may not be large enough to supply the 300 homes envisaged under Policy SH11. Given that modern residential development is subject to National Planning Policy Framework policies that seek to ensure that residential development does not prejudice neighbouring commercial users, any residential development would have to be designed to ensure that both activities can co-exist. An example of this is Maritime House, which has the benefit of a Prior Approval for conversion of some floorspace into residential floorspace.

Policy SH11 (part 4a) is too restrictive with regard to its reference to limiting building heights on "site E" to no greater than the "Vega" apartment building. Site E already includes a site (the "PortZED" site) that benefits from planning permission for a series of apartment buildings that exceed the height of the Vega building – and so the policy as worded is already effectively "out of date".

Image of the PortZED development, as viewed from Kingsway:

PROPOSED NORTH ELEVATION

Furthermore, the Vega building is on the north side of Kingsway, and so is not representative for the context of development in Shoreham Harbour. Taking examples of development along the south side of Kingsway / Kings Road – taller buildings can be found (or proposed) at the King Alfred Centre, the former Texaco Garage at Victoria Terrace (scheme approved for up to 9 storeys in height), Courtney Gate (traditional building that is 6 storeys above Kingsway) and Flag Court (1950s building that is 9 storeys above Kingsway level).

The policy should be re-worded to say that building heights should be justified with regard to analysis of urban design/impact and daylight and sunlight impact.

Policy SH11 (part 4c) refers to development being set back from Kingsway and providing a domestic scale. As above, the PortZED scheme is already edge of pavement – meaning the policy is already effectively "out of date". Furthermore the phrase "domestic scale" is very imprecise: does it refer to bungalows, houses or apartment buildings? As above: if it refers to houses or bungalows, then the extant planning permission on the PortZED site already renders the policy out of date.

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	✓	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

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3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
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How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
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Paragraph/Policy/Map no	
Comments:	

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5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	✓

Please add any additional comments below:

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Comments:	

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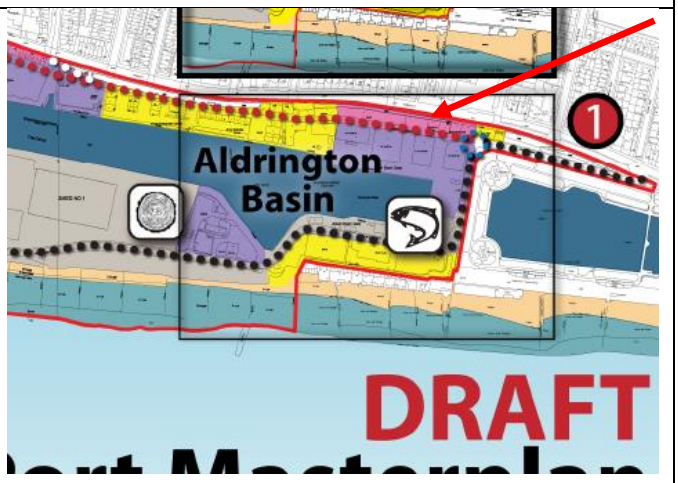
Paragraph/Policy/Map no	Policy Map

Comments: There has been a change on the policy map since the original draft plan was published. The area covered by the PortZED development was specifically highlighted in the original proposals map, whilst the current draft has deleted this scheme. Given that the PortZED scheme is an extant planning permission that has been legally commenced inside its three year time limit, the residential allocation should be re-instated on the proposals map. Current and previous iterations of the proposals map are shown below, with the PortZED development area highlighted with a red arrow:

2106 Draft Proposals Map	Original Draft Proposals Map
	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Comments:	

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Comments:	

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Your name	[redacted]
Organisation *(if applicable)*	Harbour View Developments (Sussex) Ltd
Address	[redacted] Postcode [redacted]
Phone Number	[redacted]
E-mail Address	[redacted]

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	Postcode
Phone Number	
E-mail Address	

Where do you live? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade	X	Hove	X	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade	X	Hove	X	Brighton	X
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Please add any additional comments below:

Paragraph/Policy/Map no	Policy SH11. Map 7 / Character Area 2
see over page.....	

Comments:

I would like to provide some context by setting out the development history of this part of Aldrington Basin together with the circumstances around the creation of the development brief for the South Portslade industrial area and Aldrington Basin.

A meeting to discuss the Joint Area Action Plan was arranged at the offices of Shoreham Port on Monday 6th February 2017. In attendance were Chris Jones, Tori Stockwell and Rebecca Fry.

Within this meeting Chris Jones confirmed that the wording relating to the maximum height of development being no more than four storeys and that development shall not exceed the height of the Vega building, had simply been transposed from the development brief adopted on 19.09.13. He further confirmed that there had not been any further analysis to justify the height limitations contained within the development brief.

Rebecca Fry confirmed that the original draft of the development brief presented to the Economic Development & Culture Committee had not contained the wording "any development shall not exceed the height of the recently built Vega flats", and that the brief had been amended in the meeting at the request of members on the basis that they felt this height would be acceptable to local residents. Confirmation of this can be found in the minutes of this meeting which state as follows:

> *24.4 Councillor Brown circulated a proposed Conservative amendment which had been seconded by Councillor Fitch*
>
> *"2.1 Amendment: That the Economic Development and Culture Committee notes the summary of the Consultation Statement and approves the "South Portslade Industrial Estate and Aldrington Basin Development Brief" (subject to recommendation 2.2 below) as a material planning consideration in the assessment of development proposals and planning applications.*
>
> *2.2 That in relation to Aldrington Basin, on the South side of Kingsway, in order to protect the amenity of the West Hove townscape, any development shall not exceed the height of the recently built Vega flats and that the planning brief be amended accordingly."*

I further reminded the meeting that this amendment was presented as a last minute amendment on the day of the meeting. The chief planner at the time, Martin Randall confirmed to the committee that although it was in the gift of members to amend the brief, he confirmed there was no planning justification for this amendment. However members decided to adopt the brief with the amended wording as a matter of political expedience despite there being no evidence to justify this.

Shortly after the adoption of this development brief, the planning department recommended the PortZED scheme (BH2012/04044) to committee for approval on 30.10.13. This relates to an area of land contained within Aldrington Basin between Kingsway and Basin Road North. The majority of this development, a total of four out of six buildings, exceeded the height of the Vega buildings. This development is currently being implemented together with an unconnected residential approval for a neighbouring site immediately to the East. Furthermore provisional plans have been produced for the site which lies immediately to the West of the PortZED development. Therefore it is clear that the character and streetscape has changed significantly since the creation of the development brief and therefore the height limitations contained within the original brief are now redundant and out of date.

I believe that the current Joint Area Action Plan would be found to be unsound by an inspector for the following reasons:

1. The plan has not been positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF states that local planning authorities should positively seek opportunities to meet the development needs of their area, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this framework.

   It is clear that the planning department has been presented with a wealth of evidence as part of the PortZED planning application process. After due validation, consultation and consideration, officers and members agreed that a development comprising four buildings taller than the Vega building was appropriate for this small section of the site tested under this application.

   It is abundantly clear within their report, that the planning department confirms that after full assessment of the application, they could not find any grounds to refuse the application. In particular they noted the following:

   > *8.52 The proposed parking and cycling is acceptable in terms of standards outlined in SPGBH4. The development would not result in the harmful generation of vehicular movements to or from the site and displaced parking can be accommodated in surrounding streets without harm to existing residents. The development would not result in a harmful demand for travel.*
   >
   > ***9 CONCLUSION***
   > *9.1 The development would make effective and efficient use of land within the built up area and would provide key elements of employment and residential uses with 40% affordable housing. The proposed mix of uses is acceptable subject to conditions relating to the proposed floorspace.*
   >
   > *9.2 The development would not cause significant harm to neighbouring amenity through loss of light, outlook, privacy or increased noise and disturbance. The development would make highly efficient use of resources and meets the demand it creates for infrastructure, including transport, education and open space.*
   >
   > *9.3 The height and scale of the development would impact on the adjoining area. Although the proposed scheme is not in strict conformity with the Brief in this respect, the overall benefits of the scheme in contributing to the wider aims of the Brief, JAAP and City Plan are considered to outweigh the concerns over the height requirements within the brief and, on balance, justify an exception in this case. The reduced height and scale to the east and west of the site coupled with the separation between buildings would provide a transition with adjoining development. In this instance, and on balance, the proposed design is considered sufficient to address the local context.*
   >
   > *9.4 Furthermore, early development of this site is highly desirable to provide a catalyst for further regeneration of the Aldrington Basin area in order to achieve the overarching aims of the Brief, in particular its aim of promoting "high quality innovative design alongside high levels of sustainability" and providing "a series of sustainable, mixed-use developments".*

It is therefore apparent that this 18 meter / 6 storey development was considered to be acceptable on all known planning grounds, except for contravening the arbitrary height restrictions contained within the amended development brief.

On the basis of this evidence, the Joint Area Action Plan must be amended to remove reference to height limitations.

2. The plan is not the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence. The evidence presented as part of the above planning application, together with the council's own study carried out by Allies & Morrison which informed the original development brief, supports the assumption that taller buildings may be appropriate for this site.

   Furthermore, the council has already commissioned Gillespie's to carry out a study of sites suitable for tall buildings within the city. This study concluded that this section of Shoreham Harbour fell into a 'tall buildings node'. A node or corridor is an area capable of supporting tall buildings. This study informed the current tall buildings policy SPG15. The council also commissioned the BRE to undertake an independent assessment of the daylight implications of tall buildings within this location within its preparation of the development brief. Following this the council asked the BRE to conduct a further assessment of the PortZED development. The BRE's conclusions are outlined in the case officer's report to committee. It concluded the following:

   > *"8.33 The BRE have advised that loss of daylight and sunlight to adjoining windows*
   > *would meet their guidelines in every case; loss of solar radiation to adjoining properties would be very small; and, the development would meet guidelines for sun on ground, with the shadow of the development not reaching rear gardens on March 21st (the key date for assessment)."*

   The case officer further confirms that:

   > *"8.35 This view is consistent with a separate report prepared by the BRE as part of*
   > *the Development Brief. This report advised that higher development heights could be achieved on land south of Kingsway, including the application site, if enough light came around the side of buildings."*

   In summary, the council has no evidence to support the assertion that building heights should be limited to four storeys / height of Vega building. It has overwhelming evidence that this section of Aldrington Basin is capable of supporting buildings taller than four storeys. Therefore to disregard this evidence and to include a maximum height, cannot be considered to be the most appropriate strategy.

3. The plan is not consistent with national policy for the following reasons:

   1. The NPPF states that local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.

      It is apparent that the design of the PortZED development was considered to be of sufficient merit to overcome any townscape concerns. It therefore follows that any subsequent extension of this development would also qualify.

Therefore the plan as worded will contravene national planning policy.

2. It further states that crucially Local Plans should:
    - plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework
    - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate

It is obvious that the plan as worded fails to promote development and undermines the form, scale and quantum of development possible.

Finally the plan as currently worded contravenes and frustrates the policy ambitions expressed in the government white paper "*Fixing Our Broken Housing Market"* issued on 6th February 2017. Within this white paper the government sets out the following policy ambitions and amendments to the NPPF, each of which are incompatible with the wording of this plan:

- We must make as much use as possible of previously developed ("brownfield") land for homes.
- The presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary.
- Authorities and applicants need to be ambitious about what sites can offer, especially in areas where demand is high and land is scarce, and where there are opportunities to make effective use of brownfield land.
- Local planning authorities should be able to demonstrate that they have a clear strategy to maximise the use of suitable land in their area, so it is clear how much development can be accommodated.
- Decision makers should firstly consider whether there are any national policies that justify restricting development and then whether any adverse impacts would "significantly and demonstrably" outweigh the benefits.
- Development proposals should make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs; address the particular scope for high density housing in urban locations that are well served by public transport.

Within the meeting on the 6th February at the offices of Shoreham Port Authority, it was clear that officers are far from ambitious about what the site can offer. It was stated by one officer that the height limit of four storeys was justified so as to deter applicants from submitting applications of greater height and density. This surely is not the ambitious approach to maximise the use of suitable land which the government is demanding. Policy officers and planners should surely be encouraging applications which stretch the planning system, allowing for an unbiased assessment of each application under standard planning criteria.

Policy H11 should be reworded to say that building heights should be justified with regard to analysis of urban design / impact and daylight and sunlight impact.

I would like to have the opportunity to give oral evidence directly to the inspector and produce further evidence in support of my response.

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	X	Dissatisfied		Very Dissatisfied		Unsure	

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Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
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5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

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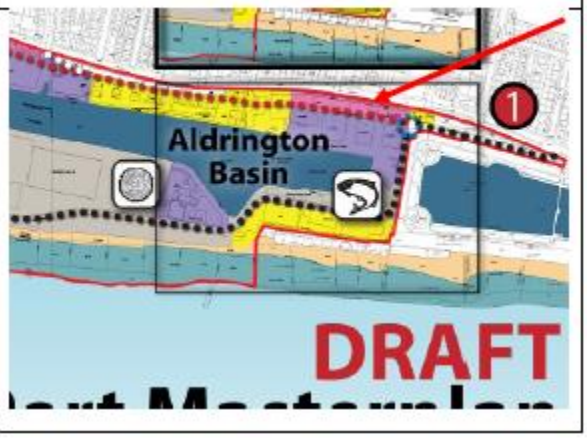
2106 Draft Proposals Map

Original Draft Proposals Map



Paragraph/Policy/Map no	

Comments:

6) Anything else? Please add any additional comments below:

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Comments:

Paragraph/Policy/Map no	

Comments:

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All forms must be received by 5pm on 10th February 2017

Your contact details:		
Your name	[redacted]	
Organisation *(if applicable)*	Kingsway and West Hove Residents' Association	
Address	[redacted]	
		Postcode [redacted]
Phone Number		
E-mail Address	kawhra@gmail.com	

Your agent's contact details: *(if applicable)*		
Agent's name	Susan Moffatt BA MRTPI (ret'd) (Vice Chair)	
Organisation *(if applicable)*	Kingsway and West Hove Residents Association	
Address	63 Derek Avenue	
	Hove	
		Postcode BN3 4PE
Phone Number		
E-mail Address	samoffatt@btinternet.com	

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove	x	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove	x	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			x
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**SH11 page 81**

Comments:

<u>SH11 Aldrington Basin page 81</u>:

The attractive southwest Hove residential neighbourhood adjoins Aldrington Basin. The difference in levels between the housing area and the port area currently safeguards residents' amenity. In future the proposed development on the dividing bank could prejudice residents' quality of life unless the form of development and uses fronting Kingsway are very carefully considered.

In this respect residents are very pleased to see the restriction of development height to that of the adjacent Vega flats retained, which the council originally added to the Development Brief at the request of west Hove residents (SH11 subparagraph 4a page 81). The council subsequently justified granting planning permission for the Portzed site as 'an exception in this case' on grounds that are no longer relevant. The restriction of development height to Vega's therefore remains justified on townscape and residential amenity grounds.

Likewise we welcome the safeguards for openness, scale and townscape in SH 11 subparagraphs 3, 4b, c, and d and 5 on page 81.

However we propose a slight amendment to SH11. We propose for the avoidance of doubt a slight rewording of policy SH11 subparagraph 2 because people have misread the policy as implying that 300 new dwellings will be delivered at Aldrington Basin, and 7,500m2 of employment floorspace (in combination with SS2: South Portslade).
Instead we suggest the policy should be reworded as follows: "The partnership will work with developers to deliver (in combination with SS2: South Portslade) 300 new dwellings and 7,500 m2 of new employment floorspace."
Policy SS2 would also need to be amended for clarification for the same reason.

Paragraph/Policy/Map no	**SH11 subparagraph 4 page 81**

Comments:

Proposed amendment to SH11 subparagraph 4 Aldrington Basin page 81:

We think that SH11 sub paragraph 4 should be amended to read

"Plots between Basin Road North and Kingsway (site E on Map 8) will be released for mixed-use redevelopment (B1 and B2 at Basin Road North level**; *C3,*** A2 and B1 at Kingsway level, and C3 on upper storeys). "

Our reasons for adding C3, 'ground floor' flats, are that the north side of Kingsway is largely residential, and residents have always been concerned that too much non- residential use on the south side would be discordant and damaging to residents' amenity by virtue of noise, smells, staff and customer parking in the residential streets north of Kingsway.

These concerns were voiced in 2013 and 2014 when the previous draft JAAP was published, and the Portzed planning application was considered. However KAWHRA's arguments in favour of housing at the Kingsway level storey were not accepted at that time.

We believe that subsequent events, since 2014, demonstrate that including C3 residential use at Kingsway level needs to be reconsidered. Our reasons are that ;

1. This part of Kingsway is not a strong business area as demonstrated by the continuing reduction in the amount of employment uses on this part of Kingsway, especially on the south side, as evidenced by the recent planning applications and approvals to turn the ground floors of the existing office buildings west of the Gather Inn into flats.
2. There were continuing complaints from residents of houses on the north side about smells from the Woodies restaurant on the south side until it recently closed.
3. The operator of a new showroom amongst houses on the north side has sought to open on Sundays and Bank Holidays, which the council had restricted in the original planning permission in order to protect residential amenity. Residents fear that new businesses on the south side would eventually be seeking similar relaxation of any controls imposed on opening hours and days, perhaps for reasons of viability.
4. There is limited opportunity to provide staff and customer parking on the south side of Kingsway. However even before the proposed development on the south side the worsening of residents' parking problems in the streets north of Kingsway, resulting from high levels of non-residents parking, have led the council to consult currently on the options for parking control in streets north of Kingsway. Past assumptions that these roads would provide overspill parking for new businesses on the south side therefore are no longer justified.
5. The continued extent of vacancy and poor condition of some buildings at the southern end of Boundary/Station Road demonstrates the need to strengthen the viability of that business and shopping area rather than dissipating employment and retail uses onto Kingsway.
6. The increased housing demand level in the City Plan Part One adopted in 2016 points to the need to consider housing use on the accessible ground floors of new buildings on Kingsway.

7. The viability of Kingsway level housing is now evidenced by recently approved proposals at Britannia House, former offices on the south side of Kingsway.

Therefore for all these reasons we believe that there are no grounds for excluding C3 use from the list of uses acceptable on the ground floor of the flats proposed on the south side of Kingsway in policy SH11.4.

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the

creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**SH11.3 Page 82**
Comments: **Proposed amendment to SH11.3- green infrastructure and open space Page 82:** We propose that SH11.3 is amended to indicate that along the south side of Kingsway significant green elements should be included within the layout of the proposed development to compensate for the loss of the continuity of a significant existing green bank, which is currently an important part of the proposed green corridor area.	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied	x	Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: Improved safety for residents of West Hove cycling alongside the Portslade and Southwick beaches will be a valuable resource for healthy recreation.	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	**SH11 Transport page 83**
Comments: **SH 11 Transport Page 83** Residents of southwest Hove welcome the proposals for Basin Road South and North and the junctions with Kingsway as improvements to traffic safety and congestion and to the safety of pedestrians and cyclists in Aldrington Basin.	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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Public Consultation
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  Adur District Council has not yet received a planning application for this site, representations received during consultation on the Joint Area Action Plan cannot be considered when determining a later planning application.

Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:			
Your name	Charlotte Mayall		
Organisation *(if applicable)*	Southern Water		
Address	Southern House		
	Lewes Road		
	Brighton	Postcode	BN1 9PY
Phone Number	[redacted]		
E-mail Address			

Your agent's contact details: *(if applicable)*			
Agent's name			
Organisation *(if applicable)*			
Address			
		Postcode	
Phone Number			
E-mail Address			

Where do you live? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work? *Please tick one box only*					
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Very satisfied		Satisfied		Neutral	x	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	Policy SH7.1 Para. 3 Page 57

Comments:
Southern Water has re-assessed the water and sewerage network in the vicinity of the strategic housing allocations of the Shoreham Harbour development area. The results show that new or improved water supply infrastructure would be required to accommodate anticipated demand in the Western Harbour Arm. Local (site-specific) infrastructure will need to be delivered by the development in line with the water industry's regulatory framework. This should be recognised in Policy SH7.1 in conjunction with that already recognised for sewerage infrastructure.

We therefore propose the following amendment to Policy SH7.1 (additional text underlined):

3. All development must consider implications upon the sewerage and water supply network and ensure that capacity is adequate. New development must connect to the sewerage and/or water supply system at the nearest point of adequate capacity in collaboration with the service provider.

Paragraph/Policy/Map no	Paragraph 4.1.12, Page 69

Comments:
Southern Water operates its Wastewater Treatment Works (WTWs) in accordance with environmental permits issued and enforced by the Environment Agency. The permits set the maximum volume of treated wastewater that the company is permitted to recycle to the environment. At present, the permit at Shoreham WTW has capacity to accommodate growth proposed in the Shoreham Harbour JAAP. Given that environmental conditions and/or regulations outside Southern Water's control could change in future, we would like the wording of paragraph 4.1.12 to reflect the fact that our assessment of capacity is valid at the present time. This would need to be reconfirmed as development comes forward.

We therefore propose the following amendments to paragraph 4.1.12:

At present, ~~The~~ Shoreham Wastewater Treatment Works (owned by Southern Water) ~~concluded that the existing plant~~ has sufficient capacity to accommodate the levels of new development being proposed through this plan and the local plans for Adur and Brighton & Hove.

Paragraph/Policy/Map no	Policy SH17, Page 138

Comments:
We welcome the recognition given to the delivery of infrastructure to support the proposed new development, which is in line with one of the core planning principles contained in the NPPF to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'.

It is also important to recognise that infrastructure is provided through direct agreements with service providers and so the following additional wording is proposed to Policy SH17:

'*Direct agreements with utility providers may be required to provide infrastructure, such as sewerage infrastructure'.*

Future Consultation	
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Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

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Your contact details:	
Your name	[redacted]
Organisation *(if applicable)*	European Metal Recycling Limited
Address	[redacted]
Phone Number	
E-mail Address	

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	Postcode
Phone Number	
E-mail Address	

Where do you live? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'					

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Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Comments:	

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(Please see pages 128 and 129 for more details) *Please tick one box only*

Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied	✓	Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: See email response	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: See email	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	✓

Draft Joint Area Action Plan - Public Consulation

[redacted] 8 February 2017 at 14:34

To: "consultation@shorehamharbour.com" <consultation@shorehamharbour.com>

I enclose a completed form. We have no comments to make in regards to questions 1, 2 3 and 4.

Our comments are restricted to questions 5 and 6 which are detailed below

5 and 6. - Western Harbour Arm

We are very concerned about the proposals to increase intensification along the Western Harbour Arm.

Indeed we are surprised that there appears to be a presumption that housing developments can be constructed here without previously finding an alternative site for the European Metal Recycling yard.

Placing housing in such a location would interfere with the amenity of the new residents. Our business by its very nature generates noise and traffic. Bringing sensitive receptors into close proximity represents a real threat to our business.

I cannot emphasise enough It is a site into which we have invested a significant sum (and whilst reluctantly) we will have no choice but to take every step to protect our position including a Judicial Review.

You will be aware had a number of meetings with the Council over the years. However very little progress appears to have been made to find an alternative location for our very important scrap metal recycling yard. The only location suggested as a possibility was some land owned by the Council at Decoy Farm in Worthing. Although very limited if any progress seems to have been made on Decoy Farm and we still have doubts whether it is suitable.

I would emphasise

- Our site on Brighton Road is the largest Metal Recycling in Worthing and Adur Council areas and is recognised as a major component of the Waste Processing Capacity in the West Sussex.
- West Sussex in its Waste plan aims to achieve net self sufficiency in the transfer, recycling and treatment of waste
- Under Policy W2 – Safeguarding of Waste Management sites and Infrastructure in the West Sussex Waste Plan states that developments that prevent or prejudice the use of existing waste management sites will not be permitted unless a suitable replacement site has been identified.
- The EMR site processes the whole range of ferrous and non ferrous metals with a large shear, non ferrous building and an End of Life (ELV) vehicle facility as well as a shipping quay. The total site area is over five acres.
- We provide an essential service for both the public and private sector in Adur and Worthing processing a wide variety of waste metal products.
- The acquisition of scrap metals ensures that efficient recycling is achieved and is a helpful source of income for local businesses.

- We appreciate that whilst our yards tend not to be popular neighbours and are not pretty they are necessary if the country is to achieve their recycling targets. Local Councils are obliged to make provisions for such facilities.

- There is a real need for our facilities and without adequate protection measures from sensitive receptors the long term operation of the waste facility may be compromised.

It is essential that any Joint Area Action Plan includes provision for a replacement site for EMR in Adur or Worthing. We would urge that the proposals are revised to make such a provision.

Indeed without making such a provision for an alternative site we share the doubts repeatedly raised before the Planning Inspector as to the deliverability of house numbers by the Council in their Draft Local Plan..

These doubts (and the potential consequences) were highlighted at the recent Inspectors Independent Examination by Council for the Protection of Rural England, the Home Builders Federation as well as a number of the agents acting for the promotors of alternative sites including ECE Planning and DMH Stallard.

Regards

[redacted]

uk.emrgroup.com

[redacted]

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Public Consultation
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Your contact details:	
Your name	[redacted]
Organisation *(if applicable)*	Sustrans
Address	[redacted] Postcode [redacted]
Phone Number	
E-mail Address	

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	Postcode
Phone Number	
E-mail Address	

Where do you live? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		Ferring			

Where do you work? *Please tick one box only*					
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		Various locations in Sussex			

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			✓
Other - please specify					

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied	✓	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Comments refer to the Transport Strategy – October 2016

Sustrans supports the strategy outcomes of the Transport Strategy, crucially the need to strengthen sustainable transport mode share. It is important to stress the need to deliver the complete package of sustainable transport initiatives if this is to be achieved.

Table 6.2(i): A259 Priority Corridor Interventions

The proposed A259 cycle route **[2K]** will complete a key arterial route, serving the regeneration of the harbour area, and also connecting destinations on either side. Local data from the Adur Ferry Bridge supports a growing body of evidence that safe, direct and attractive cycle routes have significant potential to increase cycle trips. The Propensity to Cycle tool suggests that the take up of e-bikes would increase this still further. ***This is the opportunity to future proof the capacity and design of cycle routes, rather than try to re-engineer them in the future.***

A cycle path on the south side of the A259 presents the best opportunity to separate cyclists from traffic and to provide continuous priority for utility cyclists. ***The space would have to be found to make this totally off-road if it is to serve eastbound cyclists.***

The opportunity to realign NCN route 2 **[2K]** away from the current inland route arises as soon as there is a complete route between Southwick Locks and the Adur Ferry Bridge (rather than Surry Hard). ***Sustrans is happy for this proposal to be included in future documentation, maps and consultations.***

New or improved safe and convenient crossing points for pedestrians and cyclists **[2B, 2C, 2D, 2E, 2F, 2G, 2H, & 2L]** and safety improvements at junctions **[2Q]** are an essential part of the cycling infrastructure. The junction of the A259 and Wharf Road **[2G]** needs also to provide safe cycle access between the cycle path on the A259 Kingsway and Basin Road South. ***The ideal would be to get cyclists between Kingsway and Basin Road South without interacting with traffic and parked cars on Wharf Road.*** [This is recognised in Table 6.6.]

The design of bus stops on the A259 [2I] needs to avoid conflict with the off-road cycle path.

Table 6.2(ii): A283 Priority Corridor Interventions

A283 New or improved pedestrian & cycle crossing points on the A283 at Upper Shoreham Road and Ropetackle **[2U]** were proposed when the SDNP had LSTF money to improve access to the Downslink. A safer environment for pedestrians and cyclists at Ropetackle would be welcome. However***, it is hard to see how this can enable a cycle connection between the Downslink and NCN Route 2 without a radical reallocation of space on Shoreham High Street.***

An improved crossing of the A283 at the Upper Shoreham Road has become more pressing now that there is a cycle path along the A27 giving cycle access between Shoreham and North Lancing via the Tollbridge. The proposed development at New Monks Farm would make this cycle route an even greater priority. ***The proposal made by Sustrans when this was last consulted for a controlled crossing giving cycle and pedestrian access from the Tollbridge into St Nicholas Lane might be revisited.*** This would take cyclists and pedestrians away from the A283 junction with the Old Shoreham Road altogether.

Table 6.4: Accessing the Waterfront

The waterfront front route would improve the attractiveness of the route for leisure cyclists, and would build on the success of the Adur Ferry Bridge. ***The link between Surry Hard and the Adur Ferry Bridge is crucial to the success of the east-west cycle routes.*** When a waterfront route is complete on this section, it could be signed as NCN2 **[4A]** giving a 'braided' route; leisure on the waterfront, utility on the A259.

Table 6.6: Cycling and Pedestrian Network Interventions

The provision of safe (off-road) access from the A259 Kingsway to Basin Road South, avoiding traffic and parked cars on Wharf Road, would enhance the route. The lack of any cycling infrastructure here would become more apparent as the quality of the rest of the east-west cycle routes are enhanced. Improvements to the cycling environment on Basin Road South and at Southwick Locks would be welcome.

When a cycle path on the A259 corridor between Wharf Road and Southwick Locks is complete, this could be signed as NCN2 **[6A],** giving a 'braided' route; leisure via Basin Road South; utility on the A259.

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

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Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:	
Your name	[redacted]
Organisation *(if applicable)*	LCE architects UK Ltd
Address	[redacted]
	Postcode [redacted]
Phone Number	[redacted]
E-mail Address	[redacted]

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	
	Postcode
Phone Number	
E-mail Address	

Where do you live?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove	X	Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?				*Please tick one box only*	
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	X
Lancing		Worthing		Other	
Please specify if 'other'					

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local newspaper		local radio		social media		
word of mouth	X	email/letter from Shoreham Harbour Regeneration				
Other - please specify						

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Very satisfied		Satisfied		Neutral		Dissatisfied	X	Very Dissatisfied		Unsure	

Please add any additional comments below

Paragraph/Policy/Map no	**Policy SH11, Map 7,**

Comments:

1. Whilst the Joint Area Action Plan as a strategy for the redevelopment of Shoreham Harbour and the surrounding area, is to be welcomed, the lack of ambition belies the potential of the area to make a significant contribution to both housing and employment space in the area.

2. With regard to Character Area 2, subdivided into areas A, B, C, D and E, only area E is shown as being for mixed use (residential and commercial development) with the other areas shown as commercial development only. This seems overly restrictive, and may prevent future development – which may need some residential development as a form of enabling development.

3. Height restrictions when given seem woefully too low, and at the eastern end of the area – specifically Aldrington Basin (Policy SH11, part 4a) – seems to ignore the current state of play. Height restrictions are set at up to 4 storeys above Kingsway and shall not exceed the height of Vega apartments (4 storey), and yet:

    - Portzed already had a consent (BH2012/04044) for buildings at 5 storeys above Kingsway
    - It is also identified as a tall buildings node in SPG 15 & Brighton & Hove's Tall building study. It is described as follows: "*The Shoreham Harbour node represents one of the largest brownfield regeneration opportunities in the City. The multiple waterside edges and strong industrial heritage make this an important part of the overall approach to tall buildings in the city.*
    - The Study goes onto say *"The Shoreham Harbour tall building node is bounded in the west by the local authority boundary between Brighton & Hove and Adur.* ***Further study should seek to clarify the capacity of the entire harbour area to absorb tall development and the various agreements that will need to be place to ensure a cohesive approach to the development of the area.*** The current action plan does not begin to address this issue.

4. Vega apartments, which are being used as an exemplar for heights in the Aldrington Basin, is situated on the north side of A259 are immediately adjacent to existing residential properties and are not representative for the context of development in Shoreham Harbour. Equally the distance between buildings situated on the north side versus the south side of the A259 Kingsway is around 28-29m and considering most properties (both residential and commercial) are set back from the public highway, then greater heights should be possible.

5. This is borne out by the PortZed development, where the detailed daylight sunlight analysis that accompanied the planning application, and which normally restricts the height and density of any development, demonstrated there was potential for greater height on that site than the planning application was proposing. Surely, all other matters being equal, this would suggest an encouragement for greater height in line with the housing need for the City.

6. There is a wider picture, which is currently being ignored by Joint Area Action Plan certainly with regard to Brighton & Hove, in relation to tall buildings and the Tall Building study. Out of 10 zones for tall buildings, 4 are situated adjacent to the sea, including Shoreham Harbour, because the scale of the seafront allows it. The Marina, the King Alfred and the western seafront all have new buildings, new permissions or proposals for significantly taller buildings than proposed for Shoreham Harbour.

7. Policy SH11 (part 4c) refers to development being set back from Kingsway and providing a "domestic scale" and yet the PortZED scheme is already edge of pavement – meaning the policy is already effectively out of date. Furthermore the phrase "domestic scale" seems completely inappropriate to the existing scale of both Shoreham Harbour and the A259. There is a real opportunity in townscape terms to regenerate this area and create something of much greater visual interest with a more nuanced and appropriate scale.

8. It is our strong belief, after 25 years practice in the City and elsewhere, that policies should not be too prescriptive. On a case by case basis, we believe it is beholden on the Design Team to undertake a detailed analysis of the site and demonstrate that all the issues associated with high density, such as over-looking, over-shadowing, daylight and sunlight provision for neighbours, rights to light etc in tandem with the appropriate visual assessment justifies the design proposal. To pre-judge this restricts innovation and favours a bland deign. This has rather been reinforced by the Design Panel in recent that looks to specific site analysis to come to its conclusions on design efficacy. After all a policy that arbitrarily restricts height without the necessary detailed analysis surely lacks credibility.

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Paragraph/Policy/Map no	**Policy SH12, Map 8**
Comments: As above (Aldrington Basin) in terms of heights.	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable

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Very satisfied		Satisfied		Neutral	X	Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

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Please add any additional comments below:

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provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

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Very satisfied		Satisfied	X	Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

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Comments:	

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How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied	X	Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	**Policy SH16, Map 12,**
Comments: As with Aldrington Basin, the plan lacks ambition in terms of height.	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	

Comments:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
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Your contact details:	
Your name	
Organisation *(if applicable)*	Mineral Products Association
Address	[redacted] Postcode [redacted]
Phone Number	
E-mail Address	

Where do you live?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		London			

Where do you work?					*Please tick one box only*
Shoreham-by-Sea		Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	✓
Please specify if 'other'		London			

Where did you find out about this consultation?					*Please tick one box only*
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			✓
Other - please specify					

Comments on the draft joint area action plan

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	**Paragraphs 3.2.13 – 3.2.24** **Policy SH2**

Comments:

The supporting text on Minerals Wharfs (Paragraphs 3.2.13 – 3.2.24) of the draft JAAP identifies that two wharves in the Western Harbour Arm, where the proposals are for employment and residential development, are safeguarded under Policy 40 of the West Sussex Minerals Local Plan (2003). The text at Paragraph 3.2.22 sets out that:

> *"In accordance with the emerging minerals local plans and the NPPF any applications for alternative development proposals on safeguarded minerals wharves or adjacent sites will need to clearly demonstrate that there will be no net loss to capacity for the import of aggregates at the port as a result of the proposals."*

The MPA generally supports this approach and clause (5) in Policy SH2 that will also apply safeguarding to sites and activities with temporary permissions. It is essential that there continues to be sufficient protected wharf capacity in order for the draft JAAP to be considered to be in accordance with the National Planning Policy Framework and also consistent with local planning policies. Achieving no net loss in practice will require suitable replacement capacity to be secured and operational prior to redevelopment of existing wharf capacity occurring. This will not necessarily be straightforward and so the JAAP needs to acknowledge that relocation of wharves may be phased over the period of the Plan. In addition, it is important that a diversity of operators and sites continues to function competitively to best serve the local market, and 'consolidation' must be managed to ensure that competition is not stifled.

While we acknowledge that the policies in the Minerals Local Plans of East Sussex and West Sussex address safeguarding, given the importance of achieving no net loss, Policy SH2 should make explicit reference to no net loss – most suitably in amendments to clause 5.

Paragraph/Policy/Map no	**Policy SH3**

Comments:

Draft Policy SH3 states that:

> *"Prior to sites coming forward for redevelopment to alternative uses, planning permissions for continuation of current employment uses may be granted for temporary periods on a case-by-case basis."*

The MPA generally supports Policy SH3 in that it provides for continuation of activities (including aggregate wharves) on a temporary basis. This is important in reflecting the function served by the safeguarded wharves in the Western Harbour Arm and that phasing of development and regeneration will enable existing activities to continue for some time. This will also enable continued delivery of minerals close to market and creates delivers associated economic benefits.

The MPA supports Paragraph 4.7.51 that recognises that the release of sites for redevelopment to alternative uses along the Western Harbour Arm is a long term process which requires careful management and will rely on working in collaboration with landowners and businesses. In order to ensure no net loss of capacity, suitable alternative sites will need to be secured in advance of the loss of existing sites and capacity, and this process is likely to take time. it is important, therefore, that the JAAP allows for ongoing temporary consents which can be granted on a case by case basis, to help manage this change.

Paragraph/Policy/Map no	**SH10**
Comments: The MPA supports the safeguarding of this area for future port activities, including for aggregates wharf capacity relocated from elsewhere as the JAAP is implemented over time.	

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Your contact details:			
Your name	Marguerite Oxley		
Organisation *(if applicable)*	Environment Agency		
Address	Guildbourne House		
	Chatsworth Road		
	Worthing	Postcode	BN11 1LD
Phone Number	[redacted]		
E-mail Address			

Your agent's contact details: *(if applicable)*			
Agent's name			
Organisation *(if applicable)*			
Address			
		Postcode	
Phone Number			
E-mail Address			

Where do you live? *Please tick one box only*					
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Portslade		Hove		Brighton	
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Please specify if 'other'					

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Please add any additional comments below:

Paragraph/Policy/Map no	
Comments: Please see comments under section 6) below.	

Paragraph/Policy/Map no	
Comments:	

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How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	

Comments:

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	**Objective 1, Objective 6 and Objective 7 (Pages 17 – 19)**
Comments: We are pleased to see the following objectives included in the plan: • Objective 1 Climate change, energy and sustainable building (in particular water efficiency) • Objective 6 Flood Risk • Objective 7 Natural environment, biodiversity and green infrastructure	
Paragraph/Policy/Map no	**Page 31, Section 3.1.28**

Comments: We suggest that this section should be updated to refer to the latest version of the South East River Basin Management Plan which was published on 18 February 2016.

Paragraph/Policy/Map no	**Page 32, Policy SH1.2**
Comments: We support the wording in this policy and the requirement for all new homes to achieve (as a minimum standard), internal water use of no more than 110 litres per head per day and all new commercial buildings should meet the BREEAM 'excellent standard'. We support this due to the 'serious water stress' classification given for this area published in the document 'Water stressed areas – final classification (2013).'	

Paragraph/Policy/Map no	**Page 48, Section 3.6.2** **This comment may also apply to other sections within the document as appropriate**
Comments: For your information, where a flood risk area is shown as being within Flood Zone 3b, on completion of any major significant flood defence improvements (dependant on level of protection, and agreement with the Lead Local Flood Authority), the Flood Zone can be re-categorised as Flood Zone 3a, which can allow certain development types.	

Paragraph/Policy/Map no	Page 50, Policy SH6 – Flood Risk. This comment may also apply to other sections within the document as appropriate

Comments: With reference to Paragraph 1 which reads: 'Development proposals in the regeneration area must comply with the recommendations of the Shoreham Harbour Flood Risk Management Technical Guide (2015).'

Please note that there have been policy changes since the production of this guide so some of the guidance contained within it is out of date as follows:

New government guidance on climate change allowances which came into effect on 19 Feb 2016 advises that surface water disposal systems need to be designed to accommodate a 1 in 100 year flood event plus 20% for design and 40% for exceedance events.

Where sites are identified as having a fluvial flood risk, proposed development needs to assess flood risk from a 1 in 100 flood event plus 45% for revised climate change allowances.

For further information on climate change allowances, the website link https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances provides more detailed information.

Please note that Flood depths have been quoted throughout the FR Management Technical Guide (2015) and for the strategic sites without reference to the generic 1 in 200 tidal flood risk level plus 20% for climate change allowances of 5.4mAOD.

As further research and updates become available, there is the potential for flood levels and climate change allowances for tidal scenarios to change.

Paragraph/Policy/Map no	Page 50, Policy SH6 – Flood Risk. Also Page 88, Section 4.3.16. This comment may also apply to other sections within the document as appropriate.

Comments: Please note that surface water run-off and SUDS are assessed by the Lead Local Flood Authority.

Paragraph/Policy/Map no	Page 51, Section 3.7 Objective 7, second paragraph

Comments: We support the addition of the new sentence "To minimise and mitigate impacts on the natural and local environment from soil, air, water or noise pollution". We suggest that it is referenced in the text that this is in accordance with NPPF Paragraph 109.

We support this which should help ensure protection of the natural environment.

Paragraph/Policy/Map no	Page 54 Paragraphs 3.7.18 to 3.7.21 inclusive

Comments: The information/evidence provided in these paragraphs is out of date. We suggest updated text as follows:

Water quality

3.7.18 The overall groundwater quality of the Brighton Chalk Aquifer is classified as “poor” in the Water Framework Directive (WFD) Cycle 2 2015 classification. The quantitative and chemical quality are both classified as “poor”. The overall water quality of the Adur Estuary is classified as “moderate”. The ecological quality is classified as “good” whilst the chemical quality is classified as “fail”.

3.7.19 The WFD requires all bodies of water (including surface waters, coastal waters and groundwater) to achieve “good” status by 2021, and to be prevented from deteriorating in quality. It will be important for development proposals to undertake the necessary risk assessments to demonstrate Water Framework Directive compliance. Applicants should refer to the guidance document Clearing the Waters for All (https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters)
More information about the WFD and the South East River Basin Management Plan can be found at http://www.gov.uk/government/collections/river-basin-management-plans-2015 and http://environment.data.gov.uk/catchment-planning/.

3.7.20 The Environment Agency monitors the quality of bathing water at Southwick Beach. Since 2013 water quality at this location has achieved “excellent” status.

3.7.21 This means that the bathing water meets the standard for the highest, cleanest class for the revised Bathing Water Directive, which has stricter standards than those for the old Directive. More information about bathing waters and the Bathing Water Profile for Southwick Beach can be found at https://environment.data.gov.uk/bwq/profiles/.

Paragraph/Policy/Map no	Page 55, Section 3.7.31

Comments: We suggest NPPF paragraph 121 is referenced in this section.

In order to ensure appropriate consideration of land contamination, we suggest that the following reports/documents are referred to in this section:

1.The risk management framework provided in CLR11, Model procedures for the management of land contamination:

https://www.gov.uk/government/publications/managing-land-contamination

2. The Environment Agency guiding principles for land contamination and the land contamination sections in the Environment Agency's Groundwater Protection: Principles and Practice
https://www.gov.uk/government/publications/managing-and-reducing-land-contamination
https://www.gov.uk/government/publications/groundwater-protection-principles-and-practice-gp3

3. The land contamination technical guidance pages on the direct.gov website
https://www.gov.uk/government/collections/land-contamination-technical-guidance

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with:

- BS 10175:2011+A1:2013 *Code of practice for the investigation of potentially contaminated sites.*
- BS ISO 5667-22:2010 *Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points*
- BS ISO 5667-18:2001, BS 6068-6.18:2001 *Water quality. Sampling. Guidance on sampling of groundwater at contaminated sites*

We recommend that the above is added to the text.

Paragraph/Policy/Map no	Page 57, Policy SH7.1 – Water Quality, Paragraph 1.

Comments: We support the inclusion of policy SH7.1. However, the current wording in Paragraph 1 doesn't clearly refer to the protection of both **surface** and groundwater nor discharges to both surface and **groundwater**. We suggest that this should be reworded as follows:

'1. Development must protect surface and groundwater quality. Only clean surface water should be discharged into the River Adur and groundwater.'

Paragraph/Policy/Map no	Page 57, Policy SH7.1 – Water Quality, Paragraph 3

Comments: We support the wording of this policy:

‘All development must consider implications upon the sewerage network and ensure that capacity is adequate. New development must connect to the sewerage system at the nearest point of adequate capacity. Where this is not the case, appropriate contributions will be required to upgrade the network.’

Paragraph/Policy/Map no	**Page 57, Policy SH7.1 – Water Quality**
Comments: We advise that when reviewing applications for new or extensions to existing marina development, the Local Planning Authority should consider the potential impact of recreational boating on water quality. Recreational boating poses a risk to water quality through the discharge of untreated effluent directly in to water bodies. This risks causing a deterioration of the Water Framework Directive (WFD) water body status through impacting on bathing and shellfish water Protected Areas. Any deterioration to water body status is contrary to the WFD’s ‘no deterioration in status’ objective. We would therefore advise the Local Planning Authority to consider the installation of pump out facilities as part of the any new marina development such as Lady Bee Marina, to reduce the risk to water quality from recreational boating. The size of the pump out facility should be appropriate to that of the development. This advice is in line with the WFD, National Planning Policy Framework (Paragraph 109) and Objective 7 within this document. As such, we suggest the addition of the following text to this policy: ‘All marina developments must consider the installation of pump out facilities to reduce the risk to water quality from recreational boating. The size of the pump out facility should be appropriate to that of the development.’	

Paragraph/Policy/Map no	**Page 57, Policy SH7.1 – Water Quality**
Comments: We suggest the addition of the following text to this policy to ensure that Water Framework Directive water body status is not compromised: ‘All development must comply with the requirements of the Water Framework Directive. In assessing the risk of proposed development on WFD compliance the applicant is advised to refer to the Clearing the Waters for All guidance (https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters). Early consultation with statutory bodies such as the Environment Agency and Marine Management Organisation is advised.’	

Paragraph/Policy/Map no	**Page 57, Policy SH7.4 –Contamination, Paragraph 1**
Comments: We support the inclusion of policy SH7.4. However, the wording in Paragraph 1 only currently encourages the submission of a risk assessment. Ideally this policy should include the need for a desk study, conceptual model, site investigation and risk assessment.	

Paragraph/Policy/Map no	Page 61, Policy SH8: Recreation and Leisure
Comments: In order to protect water quality and Water Framework Directive compliance, we suggest the following words 'and pump out facilities' are added to Paragraph 8 as follows: '8. Where additional moorings are provided consideration must be given to the management of additional waste and sewage arising. Appropriate services, such as toilets and pump out facilities, should be provided where appropriate.'	

Paragraph/Policy/Map no	Section 4 Character Area Proposals
Comments: Overall there is fairly limited detail of land quality (contamination) and sustainable remediation in the report. We support the inclusion of Policies SH7.1, SH7.4 & SH16.1 to address Water Quality and Contamination. However, we would recommend that each Character Area proposal includes a statement of land contamination and drainage in the supporting text. In addition, we would recommend that each Character Area has a Policy related to land contamination and drainage proposals or at least a reference to policies in SH 7.1 and SH7.4. The majority of sites are likely to have been affected by historic and current activities that would have led to land quality issues. It is therefore important to ensure that issues associated with land contamination are transparent in the report to ensure protection of the environment.	

Paragraph/Policy/Map no	Page 77, Section 4.2.19 Also Page 104, Sections 4.5.12 – 4.5.14 This comment may also apply to other sections within the document as appropriate.
Comments: Please note that flood depths are given but no site levels are quoted to compare with the 1 in 200 tidal level. We therefore suggest that these sections are reworded. Also, we suggest the removal of the word 'just' in the last sentence of Section 4.2.19 on Page 77 so as not to sound dismissive of the flood risk issues associated with the site.	

Paragraph/Policy/Map no	Page 107, Policy SH14.1 – Flood Risk Management, Paragraph 4. This comment may also apply to other sections within the document as appropriate.
Comments**:** We support the inclusion of Paragraph 4 below as policy wording, however, it is not a Flood Risk Management issue so we suggest it is rewritten as a policy in its own right in the section. **'**Pollution control measures will be required to deal with surface water run-off where this is discharging straight into the Canal. This is especially relevant where waterside vehicular access is promoted.'	

Paragraph/Policy/Map no	Page 122, paragraph 4.7.34
Comments: In order to emphasise that mitigating the loss of habitat is the preferred approach and to strengthen the incorporation of habitat enhancements, we suggest rewording paragraph 4.7.34 as follows: 'Where mitigation measures to prevent impact to intertidal habitat are not feasible, any impact or loss of intertidal habitat as a result of new development or associated flood defence improvements will require the creation of compensatory habitat. Habitat creation and enhancements to new and existing flood defences and revetments/piling such as timber baulking should be incorporated to increase the biodiversity of the river edge.' We support that the document highlights that there are opportunities for habitat creation along the new defences. One of the reasons the Adur waterbody as a whole is not achieving 'good ecological potential' is due to the fact that ecological enhancements are not all in place yet. We therefore support any opportunities to protect and enhance the ecology and biodiversity of the water body.	

Paragraph/Policy/Map no	Page 125, Section 4.7.56 Also Page 130, Paragraph 8 This comment may also apply to other sections within the document as appropriate.
Comments: A setback figure of 8 metres has been referred to within the document to enable future maintenance requirements. Requirements that the Environment Agency would include in the MMO licence would be: 'Any works in, under or over the River Adur Tidal, a classified 'main river' under the jurisdiction of this Agency, and subject to its byelaws, or within 15metres of the landward toe, prior consent would be needed.' We suggest that this is included within the text. Please note that the Shoreham Harbour Flood Risk Management Technical Guide (2015) also refers to a setback figure of 8 metres to enable future maintenance requirements. Again, the requirement above applies.	

Paragraph/Policy/Map no	Page 130, Policy SH16.1 – Flood Risk Management Paragraph 2
Comments: This paragraph refers to providing land raising and/or flood defences for different heights for hard and soft defences. We are unaware of different flood level scenarios being quoted for hard defences and soft defences. (Please also note that Section 7.33 of the Shoreham Harbour FR Management Technical Guide (2015) also refers to different heights for hard and soft defences).	

Paragraph/Policy/Map no	Page 129, Policy SH16 Western Harbour Arm **This comment may also apply to other sections within the document as appropriate.**
Comments: Please note that all proposed future new defences, flood defence upgrades, slipways, pontoons, floodgates will require an MMO licence which relinquishes the need for an Environment Agency Permit [EPR]. However as part of the MMO consultation process, the EA need to be consulted and EA conditions implemented as part of the MMO licence. It is highly likely that Shoreham Port Authority will have byelaw requirements that any future proposals will need to be compliant with. Site specific Flood Risk Assessments (at the detailed planning application) will be required. We suggest that the above is included in the policy wording. Also, please note that currently the above is not referenced within the Shoreham Harbour Flood Risk Management Technical Guide (2015).	

Paragraph/Policy/Map no	Page 130, Policy SH16.1, paragraph 10
Comments: We suggest the following text be added as a bullet point to ensure protection and further enhancement of habitats: • 'Where loss of habitat occurs due to construction of moorings or pontoons or from boats resting on intertidal habitat, creation of new like for like compensatory habitat will be required.'	

Paragraph/Policy/Map no	Page 130, paragraph 12
Comments: We suggest the inclusion of the following sentence to paragraph 12 to reduce the impact of piling on migratory fish: 'Wherever possible piling should be non-percussive i.e. vibro or push piling to minimise impacts to migratory fish. Use of percussive methods should be restricted to times when ecological impact is minimal.'	

Paragraph/Policy/Map no	Page 130, Policy SH16.1, paragraphs 7, 12 and 13.

Comments: We support inclusion of these paragraphs. However, we suggest that these are also included within the Area–wide policies section such as Water Quality SH7.1 or Contamination SH7.4 as they could apply to locations other than the Western Harbour Arm and not only applicable to the flood risk management section (Policy SH16.1).

Paragraph/Policy/Map no	**Page 132, Policy SH16.4**
Comments: In order to ensure protection of habitats within the marine environment, we suggest incorporation of the sentence below between points 2 and 3 of this policy. Officers within Adur DC and the Environment Agency worked together to devise wording for this policy so we are surprised not to see any reference to this work in the current policy wording. 'Where biodiversity impacts cannot be mitigated, compensatory actions will be required. Compensatory habitat to be like for like basis based upon up to date surveys.' We support Paragraph 2. We support that the document highlights that where appropriate, development will be required to incorporate ecological enhancements. One of the reasons the Adur waterbody as a whole is not achieving 'good ecological potential' is due to the fact that ecological enhancements are not all in place yet. We therefore support any opportunities to protect and enhance the ecology and biodiversity of the water body.	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	

Draft Joint Area Action Plan
Public Consultation
16th December 2016 to 10th February 2017

Please review the Draft Shoreham Harbour Joint Area Action Plan 2016 before filling in this form. The plan is available at local council offices and libraries or online at:
www.adur-worthing.gov.uk/shoreham-harbour-regeneration/consultation

Please note:

- This form is only for representations on the Shoreham Harbour Joint Area Action Plan.
- Please do not use this form to comment on specific planning applications.
- If you wish to comment on the proposed development by Southern Housing Group at Free Wharf, please visit: www.freewharf.info
  Adur District Council has not yet received a planning application for this site, representations received during consultation on the Joint Area Action Plan cannot be considered when determining a later planning application.

Please return completed forms to: email: consultation@shorehamharbour.com

Throughout this form please tick, or put an X, in the appropriate box where required.

All forms must be received by 5pm on 10th February 2017

Your contact details:	
Your name	[redacted]
Organisation *(if applicable)*	Shoreham Society
Address	[redacted]
Phone Number	[redacted]
E-mail Address	[redacted]

Your agent's contact details: *(if applicable)*	
Agent's name	
Organisation *(if applicable)*	
Address	
Phone Number	
E-mail Address	

Where do you live?				*Please tick one box only*	
Shoreham-by-Sea	yes	Southwick		Fishersgate	
Portslade		Hove		Brighton	
Lancing		Worthing		Other	
Please specify if 'other'					

Where do you work?				*Please tick one box only*	
Shoreham-by-Sea	yes	Southwick		Fishersgate	
Portslade		Hove		Brighton	

Lancing		Worthing		Other	
Please specify if 'other'					

Where did you find out about this consultation? *Please tick one box only*					
via A&W website		via B&HCC website		via WSCC website	
local newspaper		local radio		social media	
word of mouth		email/letter from Shoreham Harbour Regeneration			
Other - please specify		Meeting with Chris Jones			

Comments on the draft joint area action plan

1) The Joint Area Action Plan allocates sites at Aldrington Basin and South Portslade for redevelopment. This includes new employment floorspace, and mixed use (employment and residential) development. The plan specifies the appropriate employment use classes for individual sites. The 2014 draft of the plan allocated sites on Wellington Road (between Church Road and Brambledean Road) for mixed use development. There were several objections to this due to the nearby employment and port sites. These sites are now allocated only for employment uses.

How satisfied are you with the land use proposals at allocations SS1 - Aldrington Basin and SS2 - South Portslade? *(Please see pages 81, 92 and 93 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

2) To support and enhance the biodiversity and habitats of the harbour area, development will be required to incorporate new green infrastructure and assist in the creation of a proposed green corridor. The allocations SS1 - Aldrington Basin, SS2 - South Portslade, SS3 - Southwick Waterfront and SS4 - Western Harbour Arm Waterfront will require development to include biodiverse green roofs, green walls and suitable planting. Furthermore, where open space requirements cannot be met development must contribute to the green corridor along the A259 or other existing open spaces.

How satisfied are you with the green infrastructure requirements as outlined in the updated version of the JAAP? *(Please see pages 52, 53, 54, 82, 94, 108 and 131 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

3) The JAAP requires all new development within the four allocation areas to include district heating and cooling networks. Development will be expected to connect to district heating networks or incorporate the necessary infrastructure for connection to future networks if one does not already exist. The heating and cooling systems used by all new development should be in accordance with the heating and cooling hierarchy included in the updated version of the JAAP.

How satisfied are you with the revisions to the potential district heating and cooling network? *(Please see pages 30 and 32 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

4) The JAAP supports the development of enhanced pedestrian and cycle paths throughout the regeneration area, and ultimately the delivery of the England Coast Path and improved National Cycle Route 2. It is anticipated that the new and improved routes at the Western Harbour Arm, Canal lock gates and Portslade and Southwick Beaches will provide a more direct route along the Shoreham Harbour waterfront. The proposed system will also act as a green/blue corridor, supporting a broad diversity of species.

How satisfied are you with the proposed improvements to pedestrian/cycle routes throughout the regeneration area? *(Please see pages 52, 53 and 54 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied		Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

5) The site and land use specifications for allocation SS4 - Western Harbour Arm Waterfront has been updated to encourage intensification and to allow for taller buildings in central parts of deeper sites. Heights are more limited on the waterfront and Brighton Road frontages. This is intended to keep the development to an appropriate scale, while also recognising the need for high density development to make development viable. The updated JAAP also encourages a mix of dwelling sizes ranging from one, two and three bedroom homes.

How satisfied are you with the proposed land use specifications and the revisions to development form and type at allocation SS4 – Western Harbour Arm Waterfront? *(Please see pages 128 and 129 for more details)* *Please tick one box only*											
Very satisfied		Satisfied		Neutral		Dissatisfied		Very Dissatisfied	Y	Unsure	

Please add any additional comments below:

Paragraph/Policy/Map no	

Comments:
Members of the Shoreham Society and other residents whom we have heard from are pleased to see these brownfield sites with their current heavy industrial uses being developed.

At the same time, we are extremely concerned that in this draft proposal for amendment of the plan, the goalposts are being moved in favour of developers and against the interests of existing Shoreham residents, family dwellings are preferable to apartments. The whole plan for the Western Harbour Arm was sold to the public on the premise of low rise terraced family housing, so the current proposal would turn the development into an entirely different concept.

It is widely felt that apartments in these desirable waterside settings will not help address the area's housing problems, and indeed are likely to worsen them, drawing in new people from outside the area, further driving up prices and further squeezing out the young and those on low income.

Only affordable or social accommodation will do anything to help these issues, and for this reason we would like to see insistence on definite 30% provision in all developments - not later abandoned by developers as they get planning permission, as has so often been the case.

We are also not in favour of increases in density and overall provision as these add further pressure on roads and other local infrastructure - which is already going to be further overstretched by the many developments which are now being built or are set to receive planning permission in the near future.

On the Free Wharf site, we feel that the current scheme which proposes 8 storey heights is too much and too high - this massive development would dwarf the Parcelforce development which as you know has been greeted with shock and horror by just about everyone in town, and would set an even higher precedent for the town. The developers knew very well what they were buying when they purchased the site and should not be arguing that they need to put more accommodation on the site than was originally expected.

Paragraph/Policy/Map no	
Comments:	

6) Anything else? Please add any additional comments below:

Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
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Paragraph/Policy/Map no	
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Paragraph/Policy/Map no	
Comments:	

Paragraph/Policy/Map no	
Comments:	

Future Consultation	
Please tick the box if you would like to opt-out of future consultation in regards to the Shoreham Harbour Regeneration Project	