

29/09/2011



**Shoreham Harbour Regeneration:
Responses to Interim Planning Guidance Consultation Draft**

- A consultation draft of the updated Interim Planning Guidance was circulated for review by selected stakeholders during July 2011.
- Limited responses were received and overall the guidance appears to have been well received as a useful document contributing to working towards a future vision for the harbour area. Comments received were mainly additional detail and minor amendments as opposed to recommendations for significant changes.
- A wider consultation and engagement process will commence shortly during the pre-Issues and Options stage for the Joint Area Action Plan (JAAP) before the subsequent formal consultation stages on the emerging JAAP over the next couple of years.
- Out of the stakeholders sent the IPG, responses were received from the following:
 - 1) Adur Resident
 - 2) Environment Agency
 - 3) Kingsway and West Hove Residents Association
 - 4) Natural England
 - 5) Southern Water
- The full versions of their representations are attached below.

Key issues of note include:

- The need to amend some of the references to specific areas of the harbour and the need for clearer differentiation between areas within Portslade and areas within Hove.
- A concern from parts of the local community that the project needs to ensure an appropriate balance of land uses including protecting local employment opportunities and port-related businesses.
- Concern raised by Southern Water that sufficient site capacity for future waste water treatment works need to be allocated for in a future planning document.
- The importance of positively highlighting the need to protect and enhance local nature designations, biodiversity, green infrastructure and access to the waterfront.
- The need for greater recognition of the potential impact of development on water quality, coastal processes and marine habitats.
- The need to be clear about the planning weight of this document and its relationship with the Core Strategies and any future policy documents for the harbour.

Stakeholder	Representation (summarised where appropriate)	Response/Action
1) Adur Resident	<p>Couple of suggestions to ensure the Interim Planning Guidance is as clear as it possibly could be:</p> <ul style="list-style-type: none"> • Within the introduction it is strongly recommended that it stipulates that the guidance will be a 'material consideration' in planning applications (presumable applications in and around Shoreham Harbor). • Secondly, it may be helpful to explain what relationship this guidance will have with the forthcoming Joint Area Action Plan (JAAP) with Brighton & Hove City Council. Will the JAAP replace this guidance? Is the JAPP proposed to still be part of the development plan? 	<p>Added further text at para 1.3.</p> <p>Added further text at para 1.5.</p>
2) Environment Agency	<p>Thank you for the opportunity to comment on the refreshed Interim Planning Guidance. We have no comments to make</p>	<p>No action required</p>
3) Kingsway and West Hove Residents Association	<p>Background to this representation:</p> <ol style="list-style-type: none"> 1. The Kingsway and West Hove Residents Association (KAWHRA) represents the community in Hove living on the edge of Shoreham Harbour in the area bordered by Kingsway, Boundary Road, New Church Road, and Roman Road. 2. The area is mostly two storey housing built in the 1920s and 30s along pleasant tree-lined streets. The area was developed at the same time as Hove Lagoon, and links were created to the Lagoon, Hove seafront and the Aldrington Basin area of Shoreham Harbour. Therefore life in the area has long been linked with the Aldrington Basin / Lagoon / Seafront area for a variety of purposes including recreation, employment, business, and of course buying fresh fish from the quayside. Many homes in the area enjoy an outlook over the harbour and sea from their upper floors. This area and the harbour area are therefore closely interrelated. 3. The difference in levels between the harbour and the homes in the area has enabled the two adjoining land uses to co-exist separately and happily for 80 years, with the effects of goods traffic generated onto Kingsway from Wharf Road as the main concern of residents. 	<p>Noted</p>

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	<p>4. KAWHRA therefore is interested in being involved in consultations on planning for the future of Shoreham Harbour.</p> <p>5. This representation has been written by KAWHRA committee member Sue Moffatt BA, MRTPI (ret'd), who until 2008 was Assistant Director of Planning for Lewes District Council, responsible for many years for policy and regeneration at Newhaven Harbour. There are many common issues between the two harbours, and therefore this representation relates to the KAWHRA area, and also to broader concerns based on that experience.</p> <p>COMMENTS</p> <p>General</p> <p>6. The guidance remains a valuable tool for co-ordinating the overall vision for Shoreham Harbour's future in the period pending the production of the formal Shoreham Harbour policies. However there are two principle concerns:</p> <ul style="list-style-type: none"> - the omission of references to the Kingsway and West Hove area which adjoins the edge of the harbour area - a need to make adjustments to better reflect the post credit crunch world <p>Key Priorities (paragraph 3.2)</p> <p>7. In view of the abandonment of infilling for the good reasons of viability and coastal processes referred to in footnote 7, the wording (copied below) needs to be amended by removal of the words in italics for the avoidance of doubt about future intentions:</p> <p>Enabling Shoreham Port to continue to play an important role in the local and wider economy <i>including consolidating it on land reclaimed from the sea to the east of the Harbour mouth.</i>⁷</p> <p>8. The western end of Hove Lagoon and west Hove Seafront is included in the IPG area. The interface between the Lagoon, the important western access to the seafront, and the Aldrington basin area will need careful handling in its regeneration. There will be an exciting opportunity for sensitive regeneration to enhance the area. Therefore we suggest adding the words in bold as shown below:</p>	<p>Reference removed. Explanatory footnote left in.</p> <p>Notwithstanding the importance of this location, the addition is</p>

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	<p>Protecting and enhancing the area's historic, environmental and other important assets including Shoreham Fort; Kingston Village Green and the Lighthouse; the Riverside Conservation area (Southwick); the Adur Estuary; western Hove Lagoon area, and the vegetated shingle beaches, and providing better opportunities for them to be experienced and understood</p> <p>9. There appears to be a misunderstanding in the document of what area is in Portslade, and what is in Hove. The boundary between the two towns runs up the middle of the road confusing called Station Road on its WEST (Portslade) side and Boundary Road on its EAST (Hove) side. In this first instance the document needs to include a reference to the area of Hove that adjoins the Harbour by adding the words in bold as shown below:</p> <p>Making the most of the area's coastal and waterfront location, including designing new development so that it complements the existing built environments of Shoreham town centre, Southwick, Fishersgate, and Portslade, and west Hove; enhances the appearance of and access to river and canal-side waterfronts and beaches, and is appropriate to its setting within the largest urban area in Sussex.</p> <p>The importance of amending this statement is demonstrated by the current controversy over the PortZED planning application, which has its feet in the harbour and its face in west Hove.</p> <p>10. Presumably the statement below refers to Station Road/Boundary Road, as described in 9 above. People in Portslade might see it as Portslade town centre, but people in Hove always refer to 'Boundary Road Hove'. To avoid confusion the following rewording would help clarify:</p> <p>Improving Shoreham and Southwick and Portslade town centres, improving the Station Road / Boundary Road centre, and creating a new neighbourhood centre for Fishersgate.</p> <p>Interim Policy Guidance (paragraph 4.7)</p> <p>11. The work on Shoreham Harbour has evolved through a period of significant change in the national economy and in government policy, and some fine tuning is justified to reflect the</p>	<p>inappropriate in this paragraph which lists sites with specific heritage and environmental designations. Regeneration needs to be handled sensitively in all parts of the harbour area.</p> <p>Reference amended accordingly</p> <p>Reference amended accordingly</p>

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	<p>needs of the post credit crunch world. The guidance recognises the importance of Shoreham Harbour as a centre for enterprise and international trade. Space for enterprise in the Brighton & Hove /Adur conurbation has long been a diminishing resource. Throughout the conurbation the house price boom resulted in the loss of business sites and premises to housing, and now population pressure is threatening to resume such site losses when finance becomes available for housbuilding. For a long time Shoreham Harbour has provided a resource for a wide variety of enterprises based in or serving the conurbation, particularly those which are not B1 class uses.</p> <p>12. The nature of business is changing with the development of high-tech, media and computing based enterprises needing new kinds of sites and premises, which usually can operate in mixed use areas. However this may not be so for new recycling industries, and there will still be a need to accommodate enterprises which should not be close to housing because of hours of operation, noise etc. By their nature harbour areas have accommodated such enterprises in the past. In the long term future the opportunities for such enterprises within the conurbation will become less as housing intensifies. Shoreham Harbour therefore could become a main hub for the growth of all types of enterprise in the conurbation.</p> <p>13. However the wording of these following sections quoted below from the IPG does seem to imply a future of mixed use gentrification, with port uses under sufferance, and general business squeezed out;-</p> <p>The following considerations apply to respective forms of development:</p> <p>i) The following uses may be supported within the Harbour area in locations which are appropriate for the respective use, in accordance with national and local planning policies, and should not conflict with port operations and port-related uses: residential, B1 business uses, tourism, retail, leisure / recreation related uses and non-residential community uses.</p> <p>ii) New development, extensions and changes of uses relating to port operational and port-related uses may be supported in the eastern arm and canal of the port, particularly on the south side.</p> <p>iii) B2 (General Industrial) and B8 (Storage & Distribution) development, that does not require a port-side location, will not normally be supported in locations identified in the</p>	<p>Noted</p> <p>For clarification, the policy states that it is <i>only the areas</i> identified within the port masterplan for future mixed-uses where B2 and B8 the proposals for new development will not generally be encouraged.</p> <p>The majority of the existing operational port</p>

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	<p>Port Masterplan for future mixed-use (where it includes residential). planning permissions may be granted for a temporary period so as not to conflict with future development plans.</p> <p>14. It is suggested that the wording is reviewed to set out the policy towards all types of enterprise more positively and to clarify the balance between provision for residential and non - B1 and similar business uses.</p>	<p>area will continue to be available to house the types of uses referred to in the comments.</p> <p>The detail of the balance of uses will be further explored in the JAAP through consultation.</p>
<p>4) Natural England</p>	<p>Overall Natural England is satisfied with the IPG for Shoreham Harbour, and would like to make the following comments which we hope you find helpful:</p> <p>The Context This section of the document could describe more positively the environmental assets of the area, including the designated sites, the coast line and the link to the South Downs via the Adur. It could also raise some environmental challenges to any proposed development such as the effect of coastal process on the coastal habitats, flood defence and development. Other opportunities include the delivery of accessible natural 'green space' (including the beach) within and around the development both for people and nature to help address deficiencies in the area. With regard to green space standards we are pleased to see that the Eco-towns standards are incorporated within this document.</p> <p>The Strategic Vision and Key Priorities This section of the document identifies/recognises most of Natural England's concerns given its remit however, we would like to highlight the following:</p> <p>i) Designated national and local nature sites (Adur Estuary SSSI, Shoreham Beach's two Wildlife Sites (Site of Nature Conservation Importance and Local Nature Reserve) in the area should be viewed more positively. These sites not only have their own intrinsic value for which they need to be protected from the adverse impacts of the development but they also enhance the area for the community and provide local distinctiveness, a sense of place and attractiveness and other benefits.</p>	<p>Further text added at 2.2</p> <p>Further text added at 4.8</p>

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	<p>ii) The role of existing and future accessible green space (or green infrastructure) should be viewed as multifunctional providing, in addition to recreation (which is stated in the IPG) areas to help enhance existing natural sites, buffer these areas and deliver biodiversity gain. This approach provides opportunities for nature and for people to have regular contact with the natural environment and the associated well being effects this provides. As well as the need for green spaces, green infrastructure can take the form of urban greening of walls and roofs and in addition to the above mentioned benefits delivers others services to the site increasing the liveability of the development (e.g. climate amelioration).</p> <p>Planning Policy Framework In the planning policy framework, Natural England would like to see more specific references to biodiversity and green infrastructure. These references could include the need to protect and enhance biodiversity on the site in accordance with national planning policy statement 9, and the duty on Public Authorities under Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'</i>. Also, the planning policy framework could cite the relevant local policies for biodiversity and green infrastructure.</p> <p>Natural England recognises the positive statement within the key planning considerations regarding the <i>'Impact on water quality and marine habitats: For developments likely to impact on the marine environment, the Environment Agency, Marine Management Organisation and Natural England should be consulted at an early stage.'</i></p> <p>In addition it would seem appropriate to also mention the Shoreline Management Plan or Coastal Defence Strategy within this framework so that these can also be considered during a proposed new development.</p> <p>Finally we welcome the use of both the Brighton Sustainability checklist for the development within this Local Authority's area (Brighton and Hove) and for the development in Adur we welcome the interim use of the same check list alongside the Eco-Town PPS1 guidance, to show the standards expected of new development.</p>	<p>Further text added at 3.2</p> <p>Further text added at 4.8</p> <p>These are cross-referenced elsewhere, such as in the SFRAs.</p> <p>Noted.</p>
5) Southern Water	Thank you for the opportunity to comment on the Shoreham Harbour Interim Planning Guidance. Southern Water supplies water and provides wastewater services to Shoreham Harbour.	

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	<p>I note that the purpose of the IPG is not to establish new planning policy but to summarise the existing planning policy framework for the harbour. We have previously responded to documents that constitute this framework, including the Shoreham Harbour Masterplan.</p> <p>We support reference to technical studies in paragraph 3.3 of the IPG. As you know the study relating to wastewater treatment has now concluded. The land-take required to provide necessary capacity for a range of scenarios has been quantified.</p> <p>The IPG should ensure that development that is likely to prejudice the future expansion of the works is not permitted. We believe this principle is covered by the second bullet point of the Interim Policy Guidance in paragraph 4.7. However, this is dependent on the planning authorities' interpretation, and there is no text which specifically flags up the issue. We therefore propose additional text to paragraph 4.8, under "Impact on Minerals and Waste" (new text underlined):</p> <p><i>Impact on Minerals and Waste: The impact of development on safeguarded wharves and existing waste facilities and the extent to which the development contributes to meeting future needs for minerals imports and waste management will be taken into account. Further detail is set out within the objectives and policies of the emerging Minerals and Waste Core Strategies. Furthermore, a study commissioned by Southern Water has identified land required to provide additional wastewater treatment capacity.</i></p> <p>We have assumed that the need to co-ordinate development with provision of utility infrastructure such as water supplies and wastewater treatment capacity is covered by other planning policy documents such as the Adur and Brighton & Hove adopted Local Plan saved policies. If this is not the case, additional guidance is required in the IPG to ensure that such co-ordination is achieved.</p>	<p>Text and footnote has been added at 4.8. Ongoing co-ordination will occur as part of infrastructure planning process for ADC Core Strategy and the Core Strategies and/or JAAP will include more detailed policy on this issue.</p>