70 Sunny wood Drive
Haywards heath
West Sussex
RH16 4PB
[redacted]

Development Management,
Adur & Worthing Councils,
Portland House,
44 Richmond Road,
Worthing,
West Sussex,
BN11 1HS

ADUR & WORTHING
19 APR 2018
PLANNING SERVICES

16 April 2018

Dear Sir,

Objection to Planning Application AWDM/1979/17

I am a committee member of Shoreham Sailing Club, and have been authorised to submit on behalf of the club, the enclosed formal objection to above planning application. I also enclose a copy of the plan referred to in the Objection.

I would like to enquire why the Club was not notified of the application as a close neighbour likely to be adversely affected by this proposed development.

I should be grateful if you would kindly acknowledge safe receipt of this objection and if you would notify me when this application is likely to be formally considered.

Yours faithfully,

[redacted]

Paul C Wilcock

Committee Member Shoreham Sailing Club.

Objection to Planning Application AWDM/1979/17

April 2018

This is an objection submitted by Shoreham Sailing Club ("the Club") to the above planning application at former site of 5 Brighton Road Brighton Road for Demolition of existing building and erection of 3 buildings to provide 136 dwellings (including 30% affordable) comprising 21no. three bed, 61no. two bed, 46no. one beds and 8no. studio flats, community and residents' space as flexible D1/D2 space to ground floor, flexible A1/A3 to ground floor, 136no. parking spaces, provision of England coastal path, access, enhanced sea defences, enhanced flood defence, connection to the Shoreham Harbour Heat Network, creation of new public realm to the A259 with hard and soft landscaping and other associated infrastructure. | Land At Former 5 Brighton Road Shoreham-By-Sea West Sussex.

1. Objection

The Club wish to object strongly to this application on the grounds that:

- Contrary to national and local planning policies, the height and location of these buildings will have a detrimental effect on micro climate of the immediate area. This alteration to the micro climate will adversely impact continued use of sailing activities, resulting in the potential loss of a well used, long established recreation facility;
- Contrary to health and safety guidelines and statutory navigation rights, the design of the development with infrastructure and building overhanging the water results in a navigation hazard to river users; and
- no account has been taken of this adverse impact of this application as required by Adur Planning Policies.

2. Background

1.1 Shoreham Sailing Club has approximately 200 members.

1.2 It has been in existence for more than 75 years.

1.3 It is a RYA affiliated sailing club.

1.4 It operates from Shoreham Sailing Club, Soldiers Point, 223 Harbour Way, Shoreham by Sea, West Sussex, BN43 5HZ Shoreham.

1.5 Its members are both recreation & family dinghy sailors and also serious racing sailors with a number of national champions in its membership (including ex Olympic medalist).

1.6 It hosts 3 National sailing events a year (Open Meetings).

1.7 It provides training for beginners – both youth and adults.

1.8 It supports regular training sessions for Scouts and Adur Sailing Club which is specifically for youngsters.

1.9 This section of Adur River is also used by a large number of sailing, rowing and motor craft.

3. Sailing location

2.1 The Club House is shown marked SSC on the attached plan ("the Plan ").

2.2 The slipway is shown marked SW on the Plan

2.3 Sailing takes place in the area hatched red on the Plan for families and those under instruction. Experienced sailors use this area as the only means to access the slipway and as the start to races at sea. At the request of the Harbour Authority the Club do not use the east arm of the harbour.

2.4 The Club is open for sailing 7 days a week and organised racing takes place on Wednesdays Sundays and some Saturdays between March and November each year.

2.5 Some time ago. the club previously also used the area hatched black on the Plan for beginner sailing and training, but this has now proved impracticable. The number of high rise buildings along the southern bank has now so affected the wind in this area that it is very difficult to sail, demonstrating the effect of building just three storeys high on the micro climate.

2.6 It is only sailing club between Dover and Hayling Island where launching can take place into a protected harbour, allowing sailing almost regardless of weather and tide; a most valuable asset particularly for training.

2.7 The prevailing wind direction is south westerly, but also with frequent northerly winds.

4. Development Location relative to Sailing Location

3.1 It is noted that the proposed development would include three blocks of flats between 7 and 10 storeys high over ground level car parking, and part of the development is built over the river.

3.2 The location of these high rise buildings is immediately to the north of the slipway and some 50 – 100 metres from the key sailing area.

3.3 It dominates the entrance to the Adur River through which all boats must sail entering and leaving the upper reaches.

3.4 It is immediately adjacent to the narrowest part of the river at Soldiers Point, where current is strongest, and where sail boats need most stable wind.

3.5 The buildings are open aspect to the prevailing winds.

5. Effect of tall buildings on wind patterns

5.1 It is accepted that tall buildings can create highly inconsistent wind patterns.

5.2 This impact affects both down wind and upstream of the building due to down draft and canyon effects.

5.3 The impact of tall buildings was researched and is clearly set out in **"Skyline – Watford's approach to Taller Buildings Supplementary Planning Document, December 2015."**

https://watford.jdi-consult.net/documents/pdfs9/Skyline%20-%20Watford%27s%20approach%20to%20taller%20buildings%20Dec%2015.pdf

5.4 The illustrations shown on pages 25 & 26 clearly show the effect of

a) the downward flow of wind, which causes the wind to accelerate near the windward corners of the tall building.

b) accelerated winds (wind canyon effect) caused when wind is funnelled between two or more buildings, showing that the height, spacing and orientation of the buildings in a specific area effects intensity of the wind acceleration.

c) wind power, which increases as the height of a building increases. Consideration must therefore be given not just to the effects on the wind, but also to gaining energy from wind power. As a result, wind is not just affected, but the power is increased. It is not recommended that tall buildings with wide facades should face the prevailing wind.

6. Adur Planning Policies relating to micro climate effects

6.1 Existing Adur Planning Policies have been ignored.

6.2 The micro climate effect of tall buildings is acknowledged in the **"Shoreham Harbour Western Arm Development Brief – July 2013, section 5.9.5"**

6.2 This specifically states that "proposals for individual taller buildings above a threshold of four or five storeys will be required to submit evidence and demonstrate an appropriate response and high quality design in relation to the following elements:..... Microclimatic impacts including wind, daylight and sunlight effects and air pollution".

6.3 No study of wind microclimate effects is evident within the online documentation of this application.

7. Adverse micro climate impact of effect of multiple tall buildings on sailing environment at Shoreham.

The adverse impact of the wind effect of the proposed buildings in such close proximity:-

7.1 to the slipway, will adversely affect safe launch and recovery.

7.2 to the red shaded sailing area, will adversely affect sheltered sailing for adult and youth training and families.

7.3 to Soldiers Point and the narrow channel with large timber groins will adversely affect safety of boats manoeuvring in relation to other boats and users of Shoreham Harbour and Adur River.

The cumulative effect of the above points potentially puts at risk sailing activities at Shoreham.

8. Adverse effect on existing and long established leisure activities.

8.1 No account has been taken in the application documents to the impact of the proposed development on existing recreational activities which are protected under a number of national and local planning policies.

8.2 Attention is drawn to:

8.3 **National Planning Policy Framework**

https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities

Section 8. Promoting healthy communities

Paragraph 70. "Planning decisions should aim .....To deliver the social, recreational and cultural facilities and services the community needs. Planning policies and decisions should:.....guard against the unnecessary loss of valued facilities and services."

Paragraph 74 refers to a loss of existing recreational facilities in terms of open space and buildings, but is equally applicable to loss sailing recreation facilities.

"Existing *facilities* should not be *lost* unless:

- an assessment has been undertaken which has clearly shown the *facilities* to be surplus to requirements
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

8.4 **Adur Local Plan 2017 (Part 4)**

https://www.adur-worthing.gov.uk/adur-local-plan/

The National Planning Policy Framework above is incorporated in the Adur Local Plan 2017

Policy 32: Open Space, Recreation and Leisure

The loss of existing open space, or sports and recreation buildings/facilities will be resisted unless

- The development is for alternative sports and recreational provision, the need for which clearly outweighs the loss; or
- An assessment has been undertaken which clearly shows the open space, buildings or land to be surplus to requirements and not required to meet any other shortfalls in open space types; or
- The loss resulting from the proposed development would be

replaced by equivalent or improved provision in terms of quantity and quality in a suitable location.

8.5 Shoreham Harbour Western Arm Development Brief – July 2013

https://www.adur-worthing.gov.uk/media/media,115933,en.pdf

5 Guiding Principles

wh21: Facilities for boat users

5.8.2 Major waterfront development schemes, are encouraged to incorporate features that improve open access to the waterfront such as river inlets as well as facilities for boat users such as additional moorings, floating pontoons/docks and slipways.

8.5.1 This development would inhibit existing river users.

8.6 Ministry of Housing, Communities and Local Government Guidance
Open space, sports and recreation facilities, public rights of way and local green space
https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

8.6.1 This states that local planning authorities should consult in cases where development would affect existing open space, sports and recreation facilities, and

8.6.2 should consult, local planning authorities Sports England in cases where development might lead to proposals which lead to the loss of use for sport of a major body of water.

8.6.3 It is noted that although Sport England have responded to consultation, only the immediate site has been reviewed and perhaps misled by the lack of information by the applicant, no party has taken into account the adverse effect on sailing and boating recreation in immediate proximity, which will be adversely affected.

9. Safety – danger from overhanging development

9.1 It is noted that the proposed development is shown overhanging the water on columns with residential accommodation above.

9.2 This is exactly in the position where it might be necessary for dinghies to manoeuvre, either blown by prevailing winds, regular flood tide or as a result of equipment failure.

9.3 Sailing dinghies at the club have masts up to 9m in height. There is therefore the potential for collisions with masts and sails becoming entangled in superstructure, with great risk to life.

10 Statutory Navigation Rights and Leisure Activities in the Western Arm

10.1 As has already been pointed out by Shoreham Port Authority in their consultation response, "leisure stakeholders have the right to navigate below mean high water. The proposed development will oversail the mean high water mark making navigation in that part of the channel unsafe and as a result statutory legislation would be breached."

10.2 The proposed development would therefore breach the statutory rights of Club members and visitors.

11 Conclusion

Adur District Council is requested to abide by its existing planning policies and guidelines, and refuse this application unless it can be unequivocally demonstrated that the design will not affect the existing micro climate and valuable sailing environment.

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Please do leave us your contact details for thoughts and further information.

to download in full providing opportunities for planning applications – already planned to extend residents local

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