APPEAL BY CINCH SELF STORAGE

UNIT 3 NEW WHARF, BRIGHTON ROAD, SHOREHAM-BY-SEA

STATEMENT OF CASE

ON BEHALF OF

CINCH SELF-STORAGE

12TH JANUARY 2026

ADUR DISTRICT COUNCIL REFERENCE: AWDM/1367/25

TABLE OF CONTENTS

		Page No.
1	Introduction	1
2	Site and Surroundings	3
3	The Appeal Proposal	11
4	Considerations Against the Development Plan and Guidance	14
5	Conclusions	21

Appendices

1. Approved (AWDM/0671/25) Site Plan and External Storage Unit Design Drawing
2. Committee Report dated 8th September 2025
3. Development Plan Policies CA7, SH3, SH5 and Policy 8

1. Introduction

1.1. On 28th October 2025, Cinch Self-Storage ("Cinch") submitted an application (ref: AWDM/1367/25) to Adur District Council (the "Council") to remove Condition 2 (Time Limit) attached to planning permission (ref: AWDM/0671/25). Condition 2 made the permission temporary for a period of five years.

1.2. The description of development for the application (Council ref: AWDM/1367/25) is:

> *Remove Condition No. 2 (Time Limit) from previously approved AWDM/0671/25: Erection of 33no. external self-storage units (Class B8), refuse store, cycle shelter and reconfiguration of car parking layout.*

1.3. On 16th December 2025, the Council refused the application. The Council published the decision notice on the same day with the following reason for refusal:

> *The removal of the time limited condition and subsequent granting of a permanent planning permission for the self-storage units would be premature in the light of the policy aims for relocating existing business uses to facilitate comprehensive redevelopment and regeneration. The application is therefore contrary to Policies CA7, SH3 and SH5 of the Joint Area Action Plan and Policy 8 of the Adur Local Plan.*

1.4. This Statement of Case considers the planning issues arising from the proposal to remove Condition 2 and is set out in the following sections:

- Section 3 sets out a consideration of the Site, its location, its surroundings and planning designations.
- Section 4 describes the proposals.
- Section 5 provides a consideration of the land use and planning policy issues.

- Section 6 sets out a conclusion.

2. Site and Surroundings

2.1. The 0.35ha, broadly rectangular site is located on the southern side of Brighton Road. A large, pitched roof warehouse building, constructed in the early 1990s, covers approximately half the site, with the remainder given over to hardstanding, which has provided space for vehicle parking, servicing and turning. The site is edged red below in Figure 1.

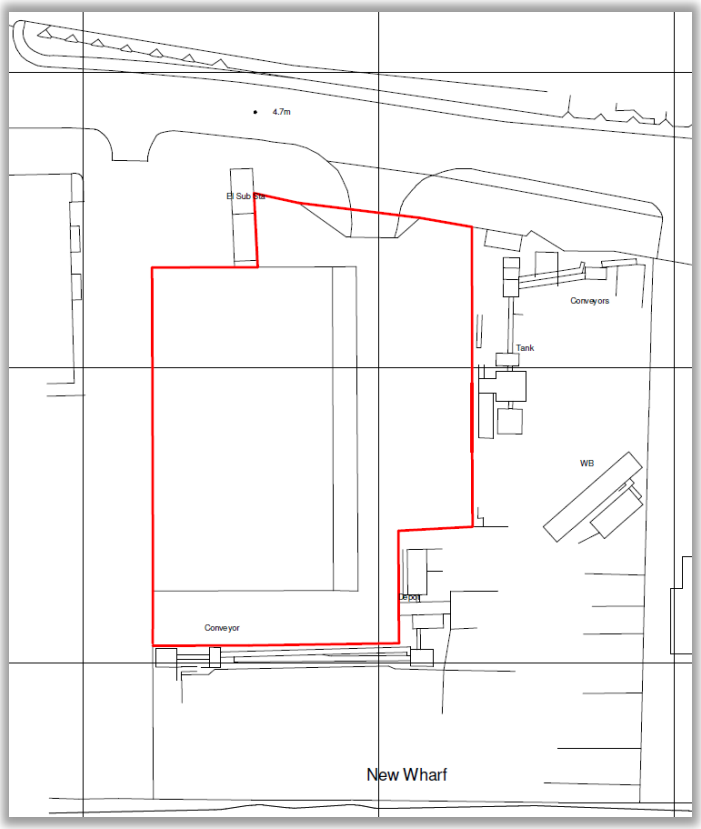


Figure 1

2.2. The area to the east of the site is characterised by large commercial buildings surrounded by hardstanding, while a recently completed major residential development is located immediately to the west. The River Adur runs to the south, a short distance beyond the site's rear boundary.

2.3. The site and its surroundings, as they were in January 2025, when Cinch was in the process of purchasing the site, are pictured in the figures below.



Figure 2 - View from Brighton Road looking south-west across the site



Figure 3 - View east along Brighton Road past the site



Figure 4 - View of site from Brighton Road



Figure 5 - View north from rear of site towards Brighton Road



Figure 6 - View west along site's rear boundary



Figure 7 - View of building's interior prior to refurbishment work commencing

Planning Designations

2.4. The site is located within the Built Up Area Boundary and the Shoreham Harbour Regeneration Area (SHRA). The SHRA is a large area running either side of the River Adur, which the Council have designated for comprehensive, mixed-use redevelopment.

Planning History

2.5. Table 1 below sets out both the relevant planning decisions and the timeline for Cinch's acquisition and development of the site.

Table 1: Planning History Summary and Timeline of Acquisition and Refurbishment

Date	Event
November 2024	Cinch agree to purchase freehold of site.
14th April 2025	Cinch purchase freehold of site.
Mid-April 2025	Work to refurbish building commences.
25th April 2025	Planning permission (AWDM/0305/25) granted for building refurbishment and associated works.
22nd May 2025	Planning application (AWDM/0671/25) submitted for external storage units.
9th September 2025	Temporary planning permission (AWDM/0671/25) granted for external storage units.
28th October 2025	Planning application (AWDM/1367/25) submitted for removal of Condition 2 (time limit) from permission (AWDM/0671/25).
16th December 2025	Planning application (AWDM/1367/25) refused.
12th January 2026	Appeal against refusal (AWDM/1367/25) submitted.
30th January 2026	Refurbished building to open for trading.

2.6. In November 2024, Cinch agreed to buy the site for £3.6m, based on the lawful Class B8 use of the existing building, with the purchase completed and freehold acquired in April 2025. Planning permission for the external refurbishment of the building

and associated works was granted in April, with work on the internal refurbishment having commenced in mid-April.

2.7. In May 2025, with the site already acquired and Cinch's refurbishment work well underway, a planning application was submitted for 35 external storage units. Planning permission, with Condition 2 (time limit) attached, was granted in September 2025. The number of units was reduced to 33 following discussions with officers.

2.8. Regardless of whether or not permission is granted for permanent external units, Cinch will complete the construction work and open the refurbished building as their 24th self-storage facility at the end of January 2026. The refurbishment works will cost £2.8m. In total, excluding works associated with the external units, Cinch will have spent £6.4m on the site and building.

2.9. The progress of the construction work is shown in the photographs below taken earlier this month (January 2026).



Figure 8 - North-facing (Brighton Road) elevation of refurbished building



Figure 9 - View north from rear of site towards Brighton Road



Figure 10 - View west along site's rear boundary



Figure 11 - View of new storage units and corridor under construction within refurbished building

3. The Appeal Proposal

3.1. On 22nd May 2025, a planning application (AWDM/0671/25) was submitted for 35 external storage units. The units were designed to be permanent and the application was submitted on that basis.

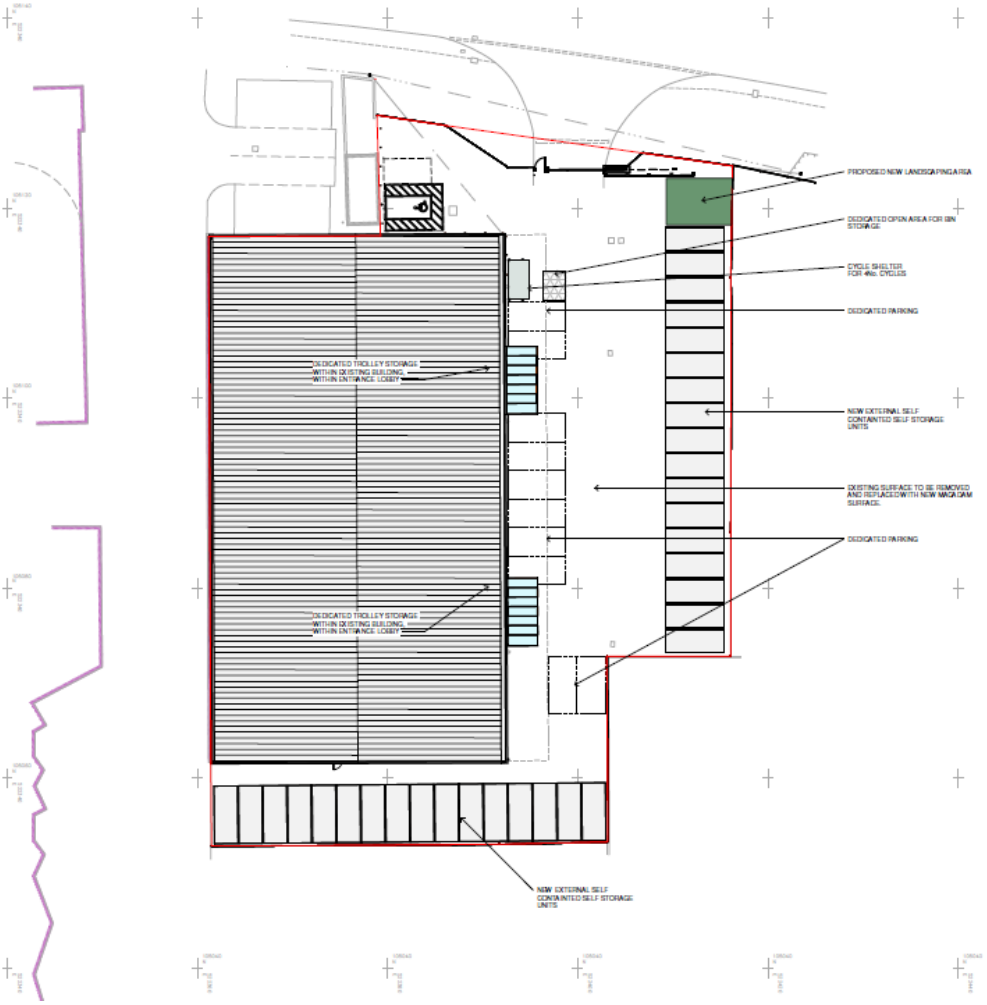
3.2. On 9th September 2025, planning permission (AWDM/0671/25) was granted for 33 external storage units; the original application proposals having been amended in response to the case officer's comments regarding their prominence in views from Brighton Road. The permission was granted subject to 14 conditions. Condition 2 made the permission temporary for five years and reads:

> *The building and works hereby permitted shall be removed and the land restored to its former condition, or to a condition to be agreed in writing by the Local Planning Authority, on or before the expiration of the period ending on 9 September 2030.*

3.3. The Appeal seeks the removal of Condition 2 in order to make the permission permanent.

3.4. The external units comprise 455sqm (GIA) of Class B8 floorspace. The refurbished building, with mezzanine floors, has 5,011sqm (GIA) of floorspace. The external units are therefore a small part (8%) of the combined floorspace (5,466sqm) on the site.

3.5. An extract of the approved site plan (ref: 6951-SSA-XX-XX-DR-A-007-P3) is shown in the Figure below (the approved plan is attached at Appendix JD1). The external storage units are located along the site's eastern and southern boundaries.



3.6. External units are a common feature of self-storage sites where surplus land is available. Details of the units are set out on drawing (ref: 6951-SSA-XX-XX-DR-A-202-P4) which forms part of planning permission (AWDM/0671/25) (attached at Appendix JD1).

3.7. As self-storage is a very low generator of traffic, a small number of parking spaces are needed to meet customer demand. In this case 12 car parking spaces are provided, leaving a significant portion of this site redundant.

3.8. The eastern and southern parts of the site, where the external units are located, will therefore either accommodate storage units and landscaping or be redundant hardstanding, serving no purpose.

3.9. They would be purpose-built and constructed from metal panels, with a roller shutter door providing access to the unit. They would be placed on a concrete base. Sustainable drainage is required to be installed on site prior to their installation (a detailed sustainable drainage scheme has been agreed with the Council via the discharge of Condition 6 (AWDM/1535/25) on 19th December 2025), and landscaping provided in the north-east corner of the site. The units, drainage and landscaping are all designed to be permanent.

4. Considerations Against the Development Plan and Guidance

4.1. The National Planning Policy Framework (NPPF) (December 2024) paragraph 57 confirms that planning conditions should be kept to a minimum and only imposed where they are:

- Necessary
- Relevant to planning
- Relevant to the development to be permitted
- Enforceable
- Precise
- Reasonable in all other respects

4.2. The Government's Planning Practice Guidance (PPG) provides guidance on when it is appropriate for conditions to be used to grant planning permission for a temporary period. The PPG states that:

> *Circumstances where a temporary permission may be appropriate include where a trial run is needed in order to assess the effect of the development on the area or where it is expected that the planning circumstances will change in a particular way at the end of that period* (Paragraph: 014 Reference ID: 21a-014-20140306).
>
> *A temporary planning permission may also be appropriate to enable the temporary use of vacant land or buildings prior to any longer-term proposals coming forward (a 'meanwhile use')* (ibid).

4.3. The PPG also notes that:

> *A condition requiring the demolition after a stated period of a building that is clearly intended to be permanent is unlikely to pass the test of reasonableness* (ibid).

4.4. The Council's reason for Condition 2 is set out on the decision notice (AWDM/0671/25) and reads:

> *Having regard to policy 8 of the Adur Local Plan and*
> *(a) In order not to prejudice consideration of future proposals for the area and*
> (b) *To enable the Local Planning Authority to review the special circumstances under which this permission is granted.*

4.5. The Committee Report (Appendix JD2) notes (final paragraph, page 36) that the applicant owns the freehold of the site and plans to operate a self-storage facility for the long term.

4.6. The Report also notes (first paragraph, page 37) that *"It is therefore unlikely that the site will be available for redevelopment in the short term"*. The Report sets out the rationale for the condition as follows:

> *However, the Council does not wish to prejudice the future opportunities for redevelopment by granting a permanent permission for the self storage units and it is therefore proposed that, should the application be considered acceptable in all other respects, that a 5 year temporary permission only be granted* (first paragraph, page 37).

4.7. The Report also notes that the preamble to Policy 8 allows for temporary uses on a case by case basis, to avoid compromising *"… the operations of businesses on sites which are unlikely to come forward until later in the process."* (page 37).

4.8. Finally, the Council's reason for refusal of application (ref: AWDM/1367/25) is:

> *The removal of the time limited condition and subsequent granting of a permanent planning permission for the self-storage units would be premature in the light of the policy aims for relocating business uses to facilitate comprehensive redevelopment and regeneration. The application is therefore contrary to Policies CA7, SH3 and SH5 of the Joint Area Action Plan and Policy 8 of the Adur Local Plan.*

4.9. Of the Government's six tests which all conditions must meet, the two most relevant to the issues raised by the Appeal are "necessity" and "reasonableness".

4.10. In order for the condition to meet these two tests there must be an expectation that planning circumstances will have changed at the end of the five year period. In this case, the circumstances must be that Cinch will have ceased their operation from the permanent building and the site will have become, or will be in the process of becoming available for purchase and redevelopment.

4.11. The redevelopment of the site would require the removal not only of the 33 external storage units (8% of the Class B8 floorspace) but also the permanent building (92% of the floorspace). The Council accept that Cinch will use the refurbished building as a self-storage facility for the long term. There is no realistic expectation therefore, that the site will become available for redevelopment in five years time.

4.12. The Council may wish to argue that the external units are essential to make Cinch's self-storage operation sustainable for the long-term, so that without the 33 units, Cinch would cease their operation, vacate the building and sell the site. This proposition is not supported by evidence.

4.13. The timeline in Table 1 confirms that Cinch acquired the site, commenced work on the building, and will open the new self-storage facility without permission in place

for permanent external storage units. At no point have they waited for permission to be granted for permanent external storage units.

4.14. Not only have Cinch proceeded with the £3.6m purchase, the £2.8m refurbishment and associated works, and are about to commence their self-storage operations on the site without permanent external storage units, it is also the case that they do not require the additional 455sqm floorspace that the external units comprise, to achieve a self-storage operation of sufficient size to fit with their portfolio of 23 other stores.

4.15. Table 2 below sets out Cinch's portfolio of stores (including those operating and under construction), which are distributed across the south of England:

Table 2: Cinch Self-Storage Portfolio of Stores

	Store	**Floorspace (GIA sqm)**
1	Watford	9,768
2	Swidon	9,067
3	Woking	8,268
4	Huntingdon	8,221
5	Wisbech	8,024
6	Brentwood	7,369
7	Newbury	6,901
8	Enfield	6,568
9	Edmonton	5,790
10	Sidcup	5,756
11	Newmarket	5,582
12	Houghton Regis	5,049
13	**Shoreham-by-sea**	**5,011**
14	Leighton Buzard	4,713
15	Southend	4,333
16	Chippenham	4,253

17	Letchworth	4,189
18	Sittingbourne	4,253
19	Gillingham	4,189
20	Bicester	3,292
21	Seaford	3,229
22	Wimbledon	3,190
23	Brighton	3,163
24	Mitcham	3,124

4.16. Of the 24 stores, the refurbished building at Shoreham is ranked 13th by size. The average store size is 5,507sqm (GIA). The Shoreham building fits comfortably within Cinch's portfolio of stores and its size is typical of their storage operations; it is comfortably larger than many of their other stores. The external units are not needed to ensure Cinch have sufficient floorspace to make the operation sustainable in the long-term.

4.17. It is important to examine whether the site is too small to accommodate the 33 external units, as well as sufficient parking spaces, servicing and turning areas, and whether their inclusion could impact negatively on Cinch's operation by putting customers off. An examination confirms there would be no material impact.

4.18. The site is large (0.35ha) and the areas where the external units are located would otherwise be redundant. Planning permission (ref: AWDM/0305/25) for the external works to the building did not include any essential, new works in these areas. The two areas are not required for car parking or for vehicles to manoeuvre.

4.19. While the long-term use of the site as a Cinch self-storage facility has been secured via the refurbishment of the building, the productive use of the two areas of redundant hardstanding has not. Given that Cinch have demonstrated how these parts of the site can be put to productive use, and that the Council have accepted the external units would, in and of themselves, cause no planning harms, the

Council's position that these areas of the site should remain redundant in the medium- to long-term, pending the entire site's redevelopment, is contrary to NPPF paragraph 85 which confirms that *"Significant weight should be placed on the need to support economic growth and productivity …"*. Paragraph 87 part (b) also gives specific support to storage and distribution operations.

4.20. Regarding Development Plan policy, in their reason for refusal, the Council have referred to Policies CA7, SH3 and SH5 of the Joint Area Action Plan and Policy 8 of the Adur Local Plan (Appendix JD3). In their view, a permanent permission for the external storage units would be in conflict with these policies.

4.21. The policies encourage the comprehensive redevelopment of the site and its surroundings. Of most relevance is Policy SH3 part 3, which reads:

> *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.*

4.22. This is consistent with the pre-amble to Policy 8 (paragraph 2.99), which officers referenced in their Committee Report (page 37) (Appendix JD2).

4.23. The circumstances anticipated in Policy SH3 and the Policy 8 pre-amble do not apply in this case. Planning permission was not required for the continuation of the current employment use and the Council have acknowledged that the long-term employment use of the site is secured by Cinch's refurbishment of the existing building.

4.24. Had Cinch required permission for the use of the existing building for self-storage purposes, it may have been consistent with the Development Plan for this to have been granted on a temporary basis, to ensure that the site remained available for redevelopment in the medium- to long-term. However, having secured the long-term use of the site, via the refurbishment of the existing building, whether the

external storage units are granted on a temporary or permanent basis will make no difference to the site's long-term availability. The provisions of the relevant Development Plan policies are not relevant to the circumstances found on the site. For these reasons, the appeal proposals are not considered to conflict with the Development Plan policies referenced by the Council.

4.25. However, if the Inspector disagreed with this conclusion and determined that there would be a conflict with the Development Plan, the fact that the site's long-term future has been secured by Cinch's self-storage operation, and that the presence or absence of the external units are not relevant to this, are material considerations that should attract sufficient weight to overcome any conflict with one or more of the policies.

5. Conclusions

5.1. Condition 2 (time limit) attached to planning permission (AWDM/0671/25) makes the permission for 33 external storage units temporary for a period of five years. The condition must meet the Government's six tests, of which, the two most relevant to the appeal are "necessity" and "reasonableness".

5.2. The Council have confirmed that the external units are, in and of themselves, acceptable and do not cause any planning harms. A trial run to test the impacts of the approved development is therefore unnecessary and unreasonable.

5.3. Having invested £6.4m in purchasing the site and refurbishing the building to create their new self-storage facility, which is similar to the averaged size store within their 24 site portfolio, before securing permission for permanent external storage units, Cinch will operate their new store, with or without the external units, from the refurbished building for the long-term. There is no reasonable expectation that the planning circumstances regarding the site's availability for redevelopment will have changed at the end of the five year period, when the permission is set to expire. On this basis, the condition is unnecessary and unreasonable.

5.4. Class B8 is the long-established lawful planning use of the site and by end January 2026, the site will again be in active lawful use. The external units provide, in effect, a small (8%) additional amount of Class B8 floorspace on existing hardstanding which no longer serves any useful purpose and would otherwise be redundant. In no sense, therefore, do the external units provide a "meanwhile" use; rather, they enable the site's long-term, lawful planning use to be extended into these otherwise vacant areas. The condition is not necessary to remove a "meanwhile" use from the site after it has served its short-term purpose. It would be unreasonable to treat the external units as a "meanwhile" use.

5.5. The external units have been designed and will be constructed to be permanent structures. The sustainable drainage scheme, required and approved by the Council via the discharge of a pre-commencement condition, and the new landscaping are all designed to be permanent features, the removal of which after five years, would be to the site's overall detriment in terms of drainage performance and appearance from Brighton Road. Condition 2, requiring the demolition of the permanent buildings is not, therefore, reasonable when assessed against the Government's guidance.

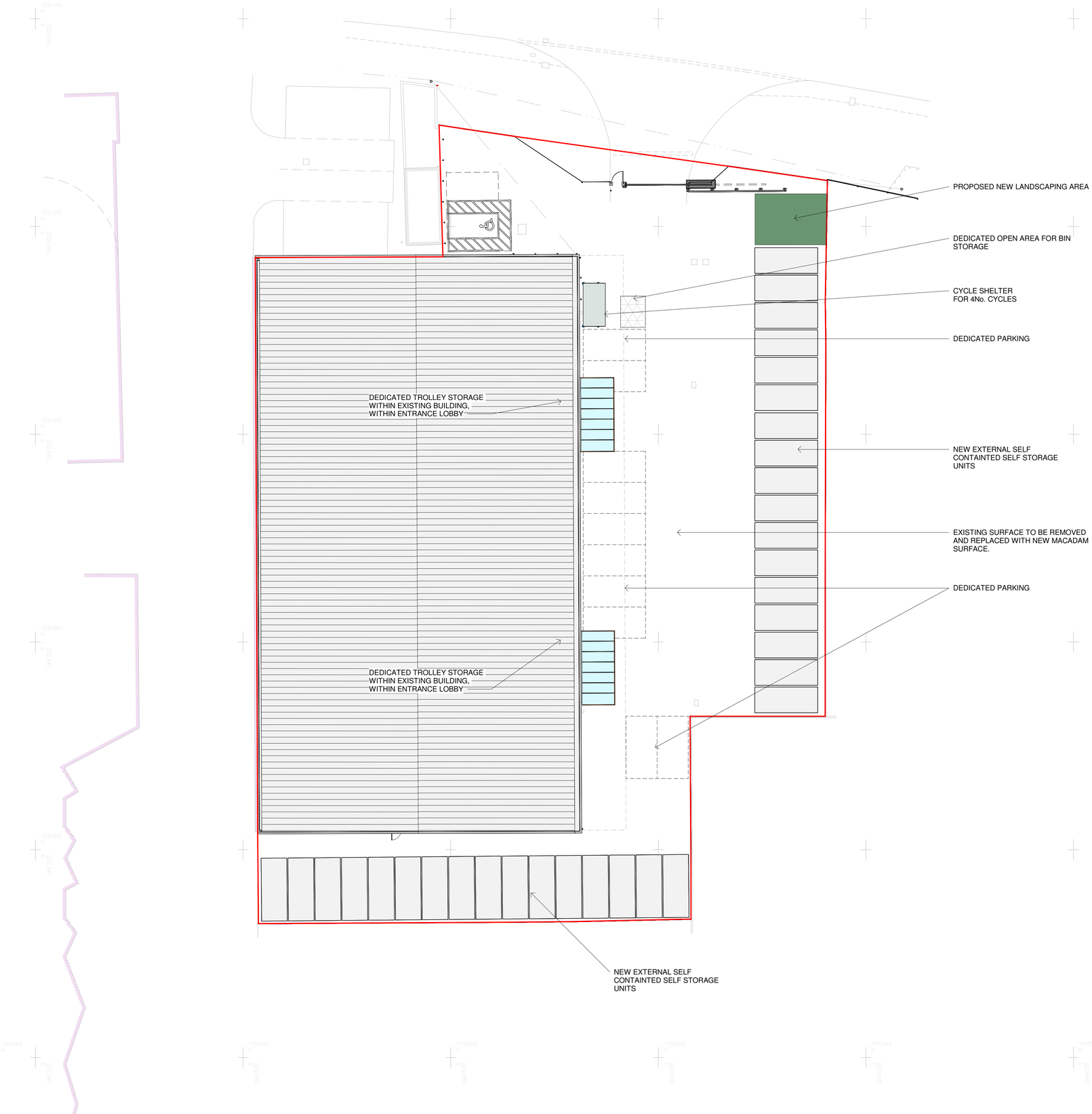
5.6. For these various reasons, Condition 2 fails the tests of necessity and reasonableness.

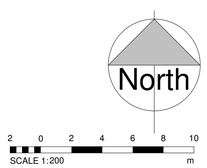
5.7. Finally, while the Development Plan allocates the site and surrounding area for comprehensive, mixed-use redevelopment, the site will be kept in continued, long-term employment use by virtue of Cinch's self-storage operation from the refurbished building. It is not the external units that will facilitate the continued employment use of the site, thereby frustrating the Development Plan's objectives. The only planning effect of these units is to bring otherwise redundant hardstanding into productive economic use, in accordance with NPPF objectives. There is no conflict with Development Plan policy and, even if there were, there are sufficient material considerations in this case to outweigh any conflict.

5.8. For these reasons, it is respectfully requested at that the Appeal be allowed.

Appendix JD1

Approved Site Plan and External Storage Unit Design Drawing





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To be read in conjunction with relevant design standards/protocols

Rev	Date	Description	Drn	Cd
P3	22/07/25	Bin storage relocated. Cycle shelter adjusted. 2No. storage units omitted. Landscaping added to front. Note regarding trolley storage added	JL	CF
P2	28/04/25	Planning Approved layout shown	JL	CF
P1	25/03/25	Planning Issue	JL	CF
P0	05/02/25	Draft Issue	JL	CF

Status: Planning

Client: CINCH SELF STORAGE

Project name:
Cinch Shoreham

Project address:
Brighton Road, Shoreham-By-Sea, BN43 6RN

Drawing Title:
Proposed Site Plan

Drg No: 6951 -SSA- XX- XX- DR- A-007 **Revision:** P3
Project Originator Building Level Type Role No.

Date:	Scale:	Sheet size:
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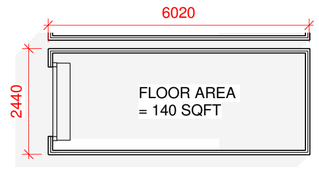

Unit Plan
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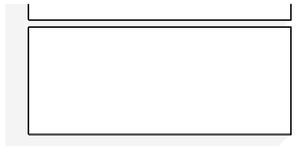


Unit Roof
1 : 100

SCHEDULE OF MATERIALS

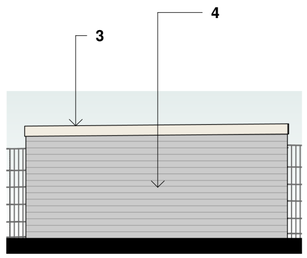
1. ROOF
PROFILED METAL SHEETING.
COLOUR : GOOSEWING GREY - RAL 7038.

2. DOOR JAMB FLASHING
POLYESTER POWDER COATED ALUMINUM. COLOUR : RAL 5003 SARGASSO BLUE

3. FASCIA, CLADDING CAPPINGS, TRIMS & FLASHINGS
POLYESTER POWDER COATED ALUMINUM. COLOUR : RAL 9002 HAMLET

4. WALL CLADDING
PROFILED METAL SHEETING. COLOUR : LIGHT = RAL 7035 OYSTER GREY

5. SHUTTER DOORS
POLYESTER POWDER COATED STEEL COLOUR : RAL 5003 SARGASSO BLUE



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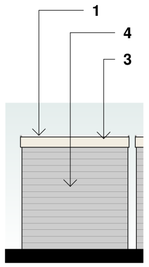

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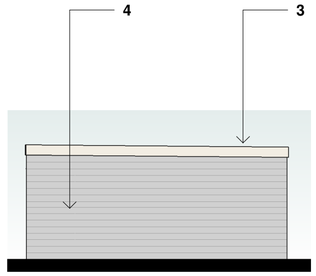

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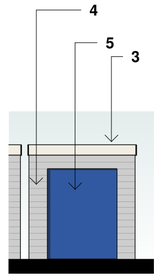

Unit Front
1 : 100

External Units layout Plan
1 : 200

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P0	05/02/25	Draft Issue	JL	CF

Status: Sketch

Client: CINCH SELF STORAGE

Project name:
Cinch Shoreham

Project address:
Brighton Road, Shoreham-By-Sea, BN43 6RN

Drawing Title:
Proposed External Storage Unit Design

Drg No: 6951 -SSA- XX- XX- DR- A-202 **Revision:** P4
Project / Originator / Building / Level / Type / Role / No.

Date:	Scale:	Sheet size:
Jan 25	As indicated	A2

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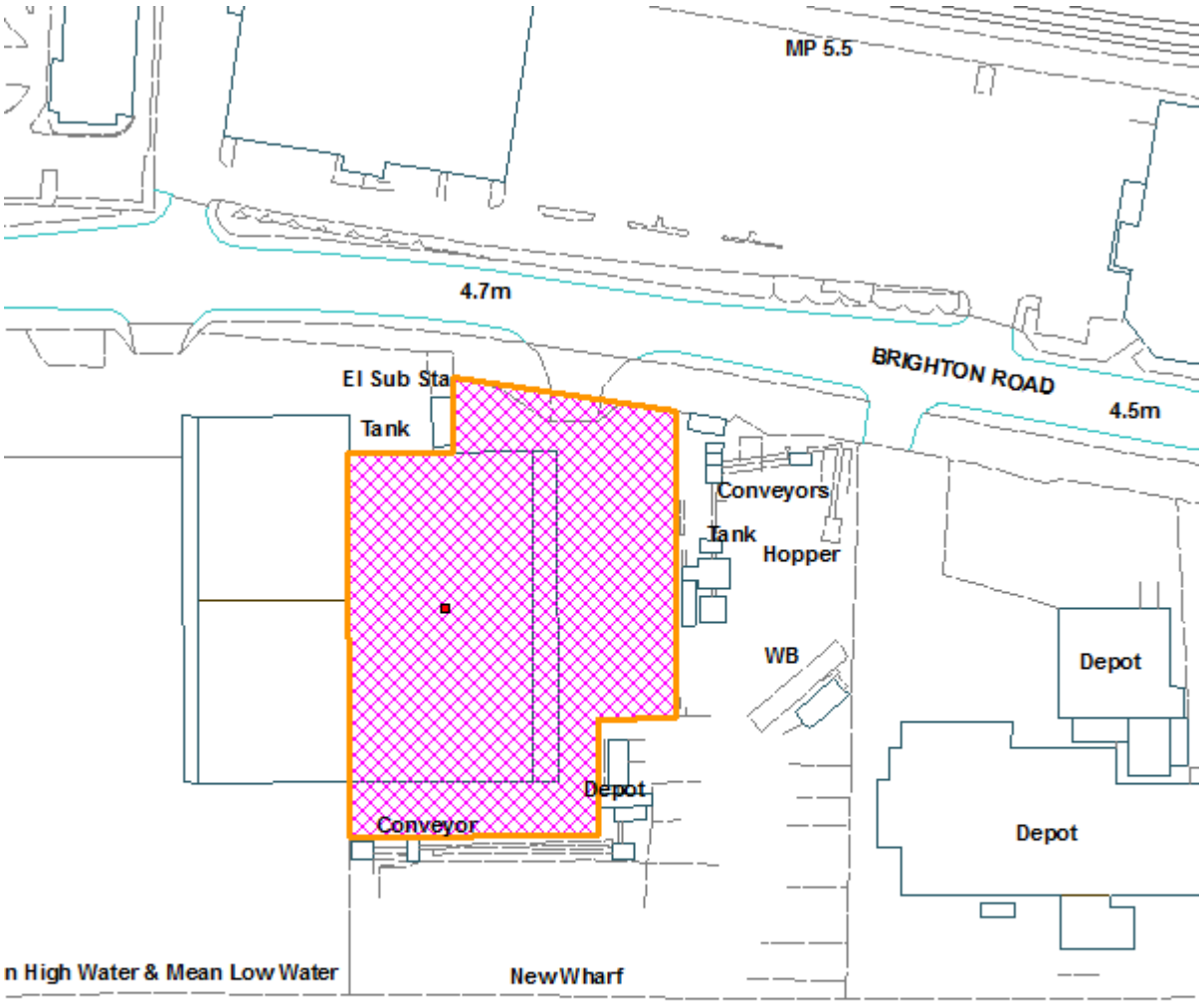
Appendix JD2

Committee Report dated 8th September 2025

Application Number:	**AWDM/0671/25**	**Recommendation - Temporary Permission**
Site:	**Unit 3 New Wharf, Brighton Road, Shoreham-by-sea**	
Proposal:	**Erection of 35no. external self-storage units (Class B8), refuse store, cycle shelter and reconfiguration of car parking layout**	
Applicant:	Cinch Self-Storage	Ward: St Mary's
Agent:	Jon Dingle Ltd	
Case Officer:	Peter Barnett	



Not to Scale

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Proposal, Site and Surroundings

The application relates to land on the south side of Brighton Road. It sits adjacent to the new residential development at Free Wharf to the west and has been vacant since June 2024. Permission was granted earlier this year for recladding the existing warehouse on the site to enable it to be used as a self storage facility by Cinch Self Storage. Work has commenced.

This application seeks permission to install 33no. Individual self storage units, each with a floor area of 13sqm. They are box shaped structures with flat roofs measuring 2.4m high and are finished in grey cladding with blue shutter doors. The units are to be sited along the eastern and southern boundaries.

The application has been amended to reduce the number of units by 2 so that they are set back from the road frontage. A bin store also originally sited close to the frontage has been relocated further back in front of the main building. A small landscaped area has been introduced in the NE corner of the site.

Relevant Planning History

AWDM/0099/16 - Change of use from B1c Light industry to B8 storage (retrospective) - approved with condition restricting opening hours to between 7am and 9pm on any day

AWDM/0886/23 - Demolition of existing warehouse and erection of an 8 storey building and basement, comprising 62 residential units (Class C3) and commercial floor space (Class E), with associated basement parking, access, and landscaping - Committee Resolution in 2023 to grant permission subject to completion of s106

AWDM/0305/25 - Alterations including replacement of existing external fabric with new cladding system to elevations and roof, new curtain wall glazing, removal of existing roller shutter doors, installation of new auto sliding entrance doors, removal of existing overhanging canopy and installation of 2no. canopies over warehouse entrance doors. Replacement of boundary fence with new 2.4m high fencing. New pedestrian gate and auto sliding gate at entrance.

Consultations

West Sussex County Council: The Highways Authority has no objection.

<u>Access and Visibility</u>
The site will utilise the existing vehicular access onto Brighton Road; no modifications are proposed to the existing access arrangements. The access is considered to be of sufficient geometry to accommodate the anticipated level of

vehicular activity. Sightlines along Brighton Road from the existing point are considered acceptable.

A review of the access onto Brighton Road indicates that, there have been no recorded Road Traffic Collisions within the last 3 years as a result of the use of the access point. There is no evidence to suggest that the access and local highway network are operating unsafely.

Network Capacity
The development proposals comprise the provision of 35 drive up storage units located on areas of hardstanding around the site. The development proposals will result in an increase in storage space on site of 455 square metres gross internal area. The TS uses the Trip Rate Information System (TRICS) database to provide an assessment of the existing trips to the site and the proposed trips to the site.
In reviewing the standalone impact, it is evident that the proposed development would have a negligible impact on the operation of the local network.

The National Planning Policy Framework (paragraph 116) indicates that development should only be resisted where the cumulative impact is severe. While the development will potentially see a small increase in the operation of the adjoining highway, the existing use as B8 is duly noted and the proposed development would not see any material change in vehicular activity. From a capacity perspective we are satisfied the proposal will not have a severe residual impact.

Parking
The proposed drive-up units will be located along the southern and eastern boundaries of the site. The on-site parking has been reconfigured to accommodate the drive-up units and suit the needs of the self-storage use of the site.
The proposed parking of 12 spaces is considered acceptable. The LHA are not aware that the previous use resulted in excess parking onto Brighton Road; it is considered unlikely that there would be an increase in on-street parking as a result of this proposal.

The site layout has been tracked via swept path diagrams with a Luton van and refuse vehicle illustrated to demonstrate that each vehicle can adequately manoeuvre at the front of the building. The vehicle tracking is shown within the TS Appendix D.

Sustainability
The submitted TS does not assess how users of the site could arrive in more sustainable modes. Brighton Road does have footway links with crossing facilities that lead to the town centre and there are bus stops a short walking distance west of the site. Realistically given the type of use, the majority of visits would be via car or van. However as previously stated the proposal is not anticipated to result in a material increase in traffic movements over the permitted and historic uses.

Condition
Car parking

Adur and Worthing Councils: Public Health: No objections in principle. Proposed hours are reasonable. Require condition to secure details of external lighting.

Surface Water Drainage: No objection on surface water grounds subject to conditions

Representations

Objection received from occupier of Flat 35 Waters Edge Anchor Close:

Is access to the external storage units 24/7 or restricted to sociable hours? As we live directly across the river we are concerned about noise pollution and would anticipate that access is restricted to sociable hours such as 8am to 8pm. If this is not the case we object to the proposal.

Relevant Planning Policies and Guidance

Adur Local Plan 2017 Policy 8, 15, 28, 36
Shoreham Harbour Joint Area Action Plan 2019 CA7
National Planning Policy Framework (December 2024)
WSCC Guidance on Parking at New Developments (Sept 2020).

Relevant Legislation

The Committee should consider the planning application in accordance with:

Section 70 of the Town and Country Planning Act 1990 (as amended) provides that the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant local finance considerations, and other material considerations; and

Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Planning Assessment

Principle

The site is within the Shoreham Harbour Regeneration area and Policy CA7 the Joint Area Action Plan and Policy 8 of the Adur Local Plan identify this area as a location for change, with the aim of relocating existing business uses to facilitate redevelopment and regeneration, primarily for the delivery of housing and employment generating uses with modern, high quality design expected. The provision of self storage units is contrary to this policy. However, the applicant has recently invested in the site and has commenced the refurbishment of the existing warehouse. The applicant owns the freehold of the site and plans to operate a self-storage facility for the long term.

It is therefore unlikely that this site will be available for redevelopment in the short term. However, the Council does not wish to prejudice future opportunities for redevelopment by granting a permanent permission for the self storage units and it is therefore proposed that, should the application be considered acceptable in all other respects, that a 5 year temporary permission only be granted.

In reaching this view, it is noted that the application is not proposing a change of use or redevelopment of the site, rather an expansion of an existing lawful use. The preamble to Policy 8 also allows for temporary uses on a case by case basis:

"It is essential to ensure that the initial phases of development do not compromise the operations of businesses on sites which are unlikely to come forward until later in the process. In accordance with the Shoreham Harbour Interim Planning Guidance, and the Western Harbour Arm Development Brief 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 relevant issues therefore are the effects on the amenities of neighbouring residential occupiers, the effect on the character and appearance of the area, flood risk and highway considerations.

Visual amenity

The individual units are relatively small and, as amended, are set back from the road. There is a reasonably wide grass verge in front of the site which further helps to reduce their impact and they are to be sited behind a new boundary fence which was approved under a previous application. Negotiations with the applicant have also resulted in the introduction of a small area of landscaping close to the entrance in the NE corner of the site which will introduce some vegetation to an otherwise hardsurfaced area. A bin store has also been relocated away from the site frontage.

The large warehouse will remain the dominant feature of the site and it is not considered that the proposal will result in visual harm to the area.

Residential amenity

The nearest residential accommodation is at Free Wharf to the west. The nearest flat is approximately 17m away from the closest unit, which is to be sited immediately on the western boundary at the southern end of the site. However, the units are small at 2.4m high and will be screened from the flats by an existing tall boundary fence which will also help to reduce noise from the site. The large warehouse will remain the more dominant feature.

Trolleys will be used to transport goods from the owners' vehicles to the units. No forklift vehicles are to be used. The applicant has agreed to opening hours of 7am and 9pm every day to be consistent with the existing restriction on the site. There is no Environmental Health objection to the proposed use and it is not considered that the use will cause unacceptable noise disturbance to nearby residents.

Residents on the opposite side of the river are unlikely to be unduly disturbed by activities on the site. The units face into the site and are likely to provide an adequate screen/noise barrier. 2.4m high paladin fencing on the southern boundary will help to screen the units.

Flood risk and Drainage

The site falls within Flood Zone 3a, allowing for climate change, as referred to in the Shoreham Harbour Joint Area Action Plan (JAAP). The storage use is an existing one and falls within a Less Vulnerable category as defined in the NPPF. The JAAP allows for development in this location, although the proposal is not among the long term uses envisaged, but in flood risk terms is no more vulnerable than potential future commercial uses and less vulnerable than potential future residential ones. As such it is not considered that sequential or exceptions tests are required but that there is a justification for making a permission temporary, so that this does not weaken the aim of the JAAP for comprehensive flood defence along the Western Harbour Arm.

There are no surface water drainage concerns with the proposal subject to the submission of further information to be reserved by condition.

Highways

There are no highway concerns with the proposal. West Sussex Highways have advised that, while the development will potentially see a small increase in the operation of the adjoining highway, the existing use as B8 is duly noted and the proposed development would not see any material change in vehicular activity. Sufficient parking will be provided in the form of 12 spaces.

BNG

The site is exempt as there is no vegetation on site at present. The new landscaped area will improve biodiversity.

Recommendation

Approve

Subject to conditions:-

1. Approved Plans

2. 5 Year temporary permission

3. Hours of use 7am to 9pm every day

4. No lighting without approval and all external lighting to be switched off within 30 mins of operating hours and not switched on again until 30 minutes before re-opening

5. The roller shutter doors on the self storage units hereby approved shall be maintained regularly to ensure they do not create excessive noise.

6. Construction shall not begin until a detailed surface water drainage scheme for the site has been submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must prioritise the use of source control Sustainable Drainage Systems (SuDS) in consideration of the Non-Statutory Technical Standards for SuDS and demonstrate no increase in flood risk as a result of the Proposed Development with sufficient supporting evidence provided to support its viability including supporting calculations for the 100% AEP (1 in 1 year), 3.33% AEP (1 in 30 year), 3.33% AEP (1 in 30 year) plus climate change, the 1% AEP (1 in 100 year) and the 1% AEP (1 in 100) plus climate change critical storms. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed

7. The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development

8. Construction Management Plan
9. Construction hours
10. Materials as specified
11. Surfacing material
12. No part of the development shall be first occupied until the car parking has been constructed in accordance with the approved site plan. These spaces shall thereafter be retained at all times for their designated purpose.
13. Landscaping
14. Contamination

Appendix JD3

Development Plan Policies CA7, SH3, SH5 and Policy 8

SHOREHAM HARBOUR REGENERATION



SHOREHAM HARBOUR JOINT AREA ACTION PLAN

ADOPTED OCTOBER 2019

3.3 Objective 3: Economy and employment

To stimulate the local economy and provide new jobs.

To provide new, high quality employment floor-space and improve the business environment to support the needs of local employers. To equip local communities with the training and skills required to access existing and future employment opportunities.

3.3.1 The development of the harbour area is a long-term aspiration. In the short to medium term (5-10 years) it is essential to ensure that the initial phases of development do not compromise the operations of businesses on sites which are unlikely to come forward until later in the process. The regeneration partnership is committed to continuing a process of dialogue to ensure mutually appropriate development as and when sites come forward.

3.3.2 The JAAP proposals have been prepared in line with consideration of their impacts on the local economy. A preliminary *Economic Impact Assessment* (GL Hearn, 2013) has been undertaken which has indicated that the proposals could generate a significant net increase in employment and additional economic output. The proposals will also promote increased supply chain opportunities, with the new business base created by the proposals potentially supporting further indirect job creation in the local economy.

3.3.3 Whilst the proposals will result in overall losses of employment land footprint as land is redeveloped for other uses, the profile of the new employment space that is created and retained will support the objectives identified in the Brighton & Hove and Adur Employment Land Studies, particularly by:

- Renewing older and poor quality industrial stock and delivering quality workshop and industrial space to meet the needs of key creative/digital industries as well as emerging high-tech manufacturing and environmental technologies sectors.
- Expanding Adur's under-developed office market through the provision of new office accommodation and thus supporting growth in higher value-added sectors.
- Providing an opportunity to deliver small, affordable, start-up office space for which there is a continuing need in Brighton.

3.3.4 Proposals that incorporate initiatives and opportunities to secure apprenticeships, training and new job opportunities for the local area will be encouraged.

3.3.5 As part of planning obligations associated with major development schemes developers may be required to contribute towards the provision of good quality employment and training opportunities during construction.

3.3.6 The regeneration partnership will continue to work with key stakeholders and local service providers to improve access and links to training and skills opportunities for local people. The Coast to Capital Local Enterprise Partnership (LEP) has produced a Skills Strategy (Skills for Growth, 2015) which identifies the need for improved employee skills across the LEP area. The Partnership will proactively engage with the LEP on this matter.

3.3.7 Some existing employment areas are protected within the relevant character area policies. The councils will monitor conversions of employment space to residential development through the monitoring framework set out in the Appendix. If necessary, in response to the identified monitoring indicator trigger, the councils will consider seeking to remove permitted development rights in accordance with Article 4 of The Town and Country Planning (General Permitted Development) (England) Order 2015.

Policy SH3: Economy and employment

1. **The JAAP proposals support the delivery of a minimum of 16,000m^2 of new employment generating floor-space in Adur and 7,500m^2 in Brighton & Hove.**
2. **To prevent the loss of employment floor-space and associated jobs in the local area, the authorities will aid the relocation of existing occupiers displaced by new development within the regeneration area, district or sub-region depending upon individual requirements.**
3. **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.**
4. **The Councils will seek agreement with developers to secure appropriate training and job opportunities for local residents.**
5. **New development will be required to contribute to the improvement of the local highways network and public realm to improve the street environment for local businesses.**
6. **Proposals should seek to incorporate or contribute towards enhancements to areas of public realm identified as being of poor quality.**

Retail uses

7. **As part of mixed-use redevelopments, small-scale, ancillary retail uses are acceptable provided that such activity will assist in enlivening key frontages and supporting existing retailing areas. Proposals should be appropriate and complementary in relation to Shoreham-by-Sea town centre and the existing district centre designation on Boundary Road/Station Road.**
8. **New development for town centre uses (other than small-scale ancillary uses mentioned in clause 1) outside of the defined town centre boundary (or Primary Shopping Area in the case of retail uses) will be assessed in accordance with the National Planning Policy Framework sequential and impact tests. An impact test will be required for any proposed retail development outside of the Primary Shopping Area with a net sales floor-space of 1,000m^2 or more.**

3.4 Objective 4: Housing and community

To provide new homes and contribute to meeting housing need.

To contribute to meeting the housing needs of Adur and Brighton & Hove through delivering new homes of a range of sizes, tenures and types, including affordable and family homes as well as associated supporting community infrastructure.

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

3.4.2 Housing needs assessments for both Adur and Brighton & Hove have identified a shortfall in housing provision in relation to need, in particular affordable and family sized homes. Supporting the delivery of new housing areas is central to the vision of transforming the harbour into an attractive waterfront community. The JAAP will support the regeneration of a number of brownfield sites which have been identified as suitable for residential development, balanced with the protection of key employment sites in other parts of the harbour.

3.4.3 Most residential development within the Shoreham Harbour Regeneration Area is expected to be multi-storey flats. A small number of terraced town houses may be appropriate on a small number of allocated sites.

Social and community infrastructure

3.4.4 To ensure the regeneration of Shoreham Harbour promotes healthy, sustainable communities, it is important that appropriate and sufficient social and community infrastructure is provided in accessible locations to serve all parts of the community. An increase in population in the area will place pressure on existing facilities and create the need for new infrastructure provision.

3.4.5 Social infrastructure refers to emergency services, schools and colleges, health facilities, community spaces and cultural venues in the area.

3.4.6 Specific items of supporting infrastructure that will need to be delivered for Shoreham Harbour are set out within the Infrastructure Delivery Plans (IDPs) that accompany the *Adur Local Plan* and *Brighton & Hove City Plan Part One*.

3.5 Objective 5: Sustainable travel

To improve connections and promote sustainable transport choices.

To promote sustainable transport choices through ensuring that new developments are well served by high quality, integrated and interconnected networks, improved pedestrian, cycling and public transport routes and seeking to reduce demand for travel by private car in innovative ways.

3.5.1 Transport improvements will be required to support the JAAP proposals and reduce the impact of existing and future traffic congestion and related air quality and noise impacts, in particular the impacts on the two Air Quality Management Areas (AQMAs). Measures that reduce reliance on the private car and improve sustainable transport choices will be promoted.

Road Network

3.5.2 The coastal settlement pattern of the regeneration area is linear with most of the key roads connected by the A259 which runs east to west through the Shoreham Harbour area. The A27 provides the strategic inland route taking much of the through traffic; however there is a significant volume of local traffic along the A259 including heavy goods vehicles.

3.5.3 Access to the main operational port area is via two main entrances off the A259 which are not well connected to the A27. The advisory lorry route to Shoreham Harbour from the A27 is via the A293. As a result, heavy goods vehicles often pass through either residential areas (via the advisory routes) or the town centres of Shoreham-by-Sea and Portslade.

3.5.4 At peak periods, journey times for vehicles on the A259 are slow, for example at Shoreham High Street. As a gateway to the regeneration area the A259 will be required to facilitate development traffic and provide access to local services. Reducing congestion on this key route is therefore essential to the regeneration proposals.

Public Transport

3.5.5 Public transport accessibility to the harbour is generally good with four local railway stations on the West Coastway line serving most of the population within a 20 minute walk. Despite good accessibility, the railway line acts as a physical barrier to north – south movements for other road users.

3.5.6 Capacity constraints on the Brighton Main Line and West Coastway have been identified by Network Rail as significant challenges facing this part of the rail network.

3.5.7 There are frequent buses along the A259. However, north-south movements are limited due to the road layout and severance created by the A259 and roads running under the railway line. In addition, there is scope to improve public perception of the bus network.

Walking and cycling

3.5.8 Shoreham Harbour is well served by pedestrian infrastructure; however the environment for pedestrians is considered to be poor and unattractive in places, and may not encourage short walking trips. In places the network is narrow, in poor condition, close to road traffic or poorly lit. The railway line and A259 both act as barriers to pedestrian movements causing severance.

3.5.9 Two key pedestrian routes connect across the harbour - the Adur Ferry Bridge from Shoreham-by-Sea town centre to Shoreham Beach and the harbour lock gates to Southwick Beach. Whilst both are well used, up until recently neither of these has offered a high quality pedestrian environment. The Adur Ferry Bridge now provides a much improved pedestrian and cycle connection between Shoreham Beach and Shoreham-by-Sea town centre and railway station.

3.5.10 To the east, the Brighton & Hove seafront provides a heavily used promenade for pedestrians and cyclists and a series of recreational activities. This ends abruptly at Hove Lagoon immediately to the east of Shoreham Harbour.

3.5.11 Southwick Beach and Carats Cafe act to some extent as destinations that help draw people to walk along the eastern part of the harbour and across the lock gates from Southwick. There is a significant opportunity to improve the quality of this experience. There are also opportunities to create visitor destinations around Shoreham Fort on Shoreham Beach and the lighthouse on Kingston Beach.

3.5.12 Monarch's Way is a long distance footpath running between Worcester and Shoreham Harbour. The route runs along Basin Road South and then along the promenades of Hove and Brighton before turning inland. Natural England is leading the delivery of the England Coast Path: a national trail that will run the entirety of the coast of England. This is planned to share the route along Basin Road South then cross the harbour at the lock gates and follow the A259 as far as Adur Ferry Bridge. In the longer term, the waterfront route at the Western Harbour Arm could be designated as part of the route.

3.5.13 The National Cycle Route 2 (NCN2) from Dover to Penzance runs through the regeneration area. This route also uses Basin Road South, before crossing the lock gates and taking an inland route to Shoreham town centre and the Adur Ferry Bridge.

3.5.14 The *Shoreham Harbour Transport Strategy* identifies a dedicated, safe and continuous cycle facility along the A259 from Wharf Road to Adur Ferry Bridge, providing a core cycle route, a critical item of infrastructure. Reducing the intimidating nature of the A259 corridor for cyclists with quality surfacing, clear signing, and provision for cycles at side roads or accesses.

3.5.15 The A259 does not currently have good infrastructure for cyclists and is heavily used by motor vehicles, including HGVs. However the road provides the most direct route between Hove and Shoreham-by-Sea. Many cyclists therefore use this route. The partnership is exploring the potential for dedicated cycle facilities along this route.

3.5.16 Adur & Worthing Councils have committed to producing a Local Cycling and Walking Infrastructure Plan (LCWIP) to improve safe routes for walking and cycling, and seek funding to implement these. The LCWIP will incorporate proposals identified in this plan and the Shoreham Harbour Transport Strategy.

Transport Strategy

3.5.17 The *Adur Local Plan & Shoreham Harbour Transport Study* (2013) and addendums (2014; 2016) assessed the impact of proposed housing and employment development at Shoreham Harbour on the highway network. It proposes a package of mitigation measures which will reduce the impact of development and encourage a shift in travel patterns to sustainable modes of transport. This package consists of sustainable transport measures, behaviour change initiatives and junction capacity improvements.

3.5.18 The *Shoreham Harbour Transport Strategy* was developed alongside the JAAP to support regeneration and development at Shoreham Harbour. The strategy contains a package of integrated transport measures that will guide the provision of transport infrastructure for the next 15 years.

3.5.19 The strategy takes a balanced view of transport provision in the regeneration area focusing on improvements to the existing road network and measures to encourage the use of sustainable modes of transport. Five key outcomes are identified in the Transport Strategy:

- OC1 Reduced levels of congestion
- OC2 Strengthened sustainable transport mode share
- OC3 Improved connectivity
- OC4 A safe and attractive environment
- OC5 Adequate parking provision and controls

3.5.20 Examples of behaviour change initiatives include travel plans, car sharing schemes, encouraging shared car ownership, and cycle training. This study is part of the evidence base for the Shoreham Harbour Transport Strategy and development proposals will be expected to contribute towards the package of measures identified.

Parking

3.5.21 Guidance produced by West Sussex County Council states that car parking provision for residential development should: take account of the expected levels of car ownership; ensure high quality of design; make efficient use of land. The guidance outlines that expected levels of car ownership and demand should be determined taking account of the type, size and tenure of the proposed development.

3.5.22 Brighton & Hove standards currently outline maximum levels of parking, however it is anticipated that new guidance will put a priority on minimising off-street car parking provision in accessible locations.

3.5.23 Due to the constrained nature of allocated sites at Shoreham Harbour, innovative approaches to parking will be required. The Transport Strategy identifies a localised approach to car parking provision such as using appropriate parking controls and the use of car clubs.

Policy SH5: Sustainable travel

1. **New development in the regeneration area must demonstrate how it intends to reduce the need to travel by car and should help to deliver sustainable transport improvements as identified in the *Shoreham Harbour Transport Strategy*.**
2. **Development will be required to contribute towards implementation of the area-wide travel behaviour change and travel choice programme set out in the *Shoreham Harbour Transport Strategy*.**
3. **The layout and streetscape of the allocations should be designed to give pedestrians and cyclists priority over vehicular traffic wherever possible.**
4. **Developments will be required to contribute towards the delivery of transport infrastructure which reduces congestion and increases the use of sustainable transport modes. Specific measures are identified in the *Shoreham Harbour Transport Strategy* including junction capacity improvements, improvements to bus and rail infrastructure and better cycling and pedestrian routes and facilities.**
5. **Improvements should focus on the following priority corridors and seek to minimise the impact of traffic, including HGV's, on surrounding communities:**
   - **A259**
   - **A283**
   - **A293**
6. **To improve the connectivity of the regeneration area, development proposals must provide or contribute towards the delivery of a comprehensive and well integrated transport network with strong linkages to town / district centres, the harbour waterfront / coastline, the South Downs, access routes and surrounding neighbourhoods. Specific network improvements for these supporting links are identified in the *Shoreham Harbour Transport Strategy*.**
7. **Proposals that incorporate facilities and/ or initiatives to promote the use of the river as a means of transport, such as provision of pontoons and additional moorings will be encouraged.**
8. **Improvements must be consistent with recommendations in the *Shoreham Harbour Streetscape Guide* and *Shoreham Harbour Transport Strategy*.**

Parking

9. **Car parking provision will be considered as part of the overall package of measures that impact on the need to travel resulting from the development. Proposals should include adequate levels of car parking for residential development or measures to promote lower levels of car ownership.**
10. **For commercial development, car parking provision should be in line with local authority maximum standards.**
11. **The amount of surface and on-street car parking should be minimised wherever possible and innovative solutions to the provision of car and cycle parking are encouraged as informed by the *Shoreham Harbour Transport Strategy*. Measures could include the creation of new car clubs or the extension of existing car clubs, by providing additional vehicles in appropriate locations and access to membership, to cover the regeneration area.**
12. **All new development proposals will be required to provide adequate, appropriate and secure cycle parking and storage facilities.**

3.6 Objective 6: Flood risk and sustainable drainage

To reduce the risk of flooding and adapt to climate change.

To ensure that development avoids and reduces the risks from flooding and impacts on coastal processes and that risks are not increased elsewhere as a result. To ensure that appropriate and comprehensive flood infrastructure is delivered. To ensure surface water run-off and water pollution have been reduced by the introduction of sustainable drainage systems.

3.6.1 Parts of the regeneration area are at a high risk of flooding due to the proximity to the coastline and the River Adur, exacerbated by the low lying topography of some sites. This is especially true for the Western Harbour Arm, parts of Aldrington Basin, Southwick and Portslade beaches as well as the port operational area.

3.6.2 Tidal flooding presents the most significant risk to the area. The *Adur & Worthing Strategic Flood Risk Assessment* and *Brighton & Hove Strategic Flood Risk Assessment* identify a number of sites located within Tidal Flood Zones 2, 3a, 3b and Non-functional Flood Zone 3b. This latter category recognises that some sites have the same risk of tidal flooding as Flood Zone 3b but do not have a significant storage or conveyance potential which materially impacts flood risk elsewhere. In addition to this tidal flood risk, some areas are also affected by fluvial and surface water flooding.

3.6.3 Working closely with the Environment Agency, the partnership has prepared a *Shoreham Harbour Flood Risk Management Guide* SPD which sets out the types of flood risk present in the harbour area, the vision for a comprehensive flood defence network along the Western Harbour Arm and the requirements of developers in relation to mitigating flood risk in the regeneration area. This guide has been adopted by both Adur and Brighton & Hove councils. A key consideration of the SPD is the impact that climate change will have on rising sea levels, storm frequency and storm magnitude.

3.6.4 Brighton & Hove City Council, in partnership with Adur District Council and the Environment Agency, has produced the *Brighton Marina to River Adur Coastal Strategy Study*. This document examines how the stretch of coastline between Brighton Marina and the River Adur (up to the Canal lock gates in Southwick) will change over the next 100 years. This includes identifying erosion and flood mitigation measures that need to be delivered over this period.

4.7 Character Area 7 – Western Harbour Arm

Area priorities

- **To designate Western Harbour Arm Waterfront as an allocation for new mixed use development.**
- **To facilitate the comprehensive development of the Western Harbour Arm Waterfront to become an exemplar sustainable mixed-use area (use classes B1 and C3).**
- **To improve legibility, permeability and connectivity through high quality building design, townscape and public realm, ensuring to respect and complement the character of surrounding areas.**
- **To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces.**
- **To facilitate the strategic relocation of industrial uses to elsewhere in the harbour or local area to free up waterfront opportunity sites.**
- **To improve access arrangements to create better linkages with Shoreham town centre and surrounding areas.**
- **To improve connections around key linkages including Shoreham High Street/Norfolk Bridge (A259) – Old Shoreham Road (A283), Brighton Road (A259) – New Road – Surry Street, and Brighton Road (A259) – Ham Road.**
- **To deliver a comprehensive flood defence solution integrated with a publicly accessible waterfront route including pedestrian / cycle way and facilities for boat users.**
- **To ensure that new development proposals mitigate noise and air quality impacts.**
- **To enhance the area's natural biodiversity by incorporating multi-functional green space, creating and improving habitats and improved green infrastructure links.**
- **To support the delivery of the England Coast Path through the Western Harbour Arm area.**
- **To support the delivery of the Shoreham Heat Network.**

About the area

4.7.1 CA7 – Western Harbour Arm is on the northern bank of the River Adur between the Harbour Mouth and the historic centre of Shoreham-by-Sea. The area is highly constrained by Brighton Road (A259) and the railway. The Western Harbour Arm is the principal approach to Shoreham-by-Sea from the east. To the north of the railway line, the area is abutted by residential neighbourhoods and a large industrial estate.

4.7.2 Shoreham-by-Sea town centre, a few minutes' walk to the west has a peaceful, coastal charm consisting of predominantly two storey terraced cottages on streets leading off from the primary shopping area. There are open views across the River Adur to the south as well as river glimpses between buildings where remnant slipways and hards remain. There is a marked contrast moving east out of the town and along Brighton Road (A259) where there are only limited views of the waterfront and public access to it.

4.7.3 Along the Western Harbour Arm there are a range of different employment uses. The waterfront sites are predominantly large industrial and open storage premises including fuel storage, plastics manufacturing, aggregates handling and metal recycling. The majority of the sites are privately owned.

4.7.4 Closer to Shoreham-by-Sea town centre is The Ham, an open space which includes a popular skate park. There is a car show room and some office and workshop units such as the Riverside Business Centre and Ham Business Centre.

4.7.5 On the northern side of the A259 are mainly 'big box' retail warehouses, a supermarket and the local municipal waste facility.

4.7.6 A number of the premises along Brighton Road (A259) are coming to the end of their useful life and are no longer ideally suited for modern business needs: either requiring significant investment on-site, or relocation to a better facility elsewhere.

4.7.7 The river wall and flood defence infrastructure is in need of upgrade and repair and some of the land stands vacant and underused.

Transport and connections

4.7.8 The Brighton Road (A259) road frontage is harsh and unattractive due to the industrial uses that prevent views across the water. The road is a very popular route with cyclists despite the lack of a formal cycle lane, poor surfacing and heavy use by heavy goods vehicles.

4.7.9 Natural England will deliver the England Coast Path, a new National Trail around the coast of England. Although the final route has not yet been decided, it is expected that this will pass through CA7: Western Harbour Arm between Kingston Beach and Adur Ferry Bridge.

Environmental considerations

4.7.10 The Western Harbour Arm is subject to a number of environmental constraints which need to be taken into account when planning for the area. These include:

- Proximity to the Adur Estuary, a Site of Special Scientific Interest (SSSI).
- Proximity to Shoreham Beach, a Local Nature Reserve (LNR) and Local Wildlife Site (LWS).
- Shoreham-by-Sea Air Quality Management Area (AQMA) that covers the town centre and the western part of the Western Harbour Arm.
- A municipal waste site.
- A metal recycling facility. It is proposed that this be relocated.
- A Health and Safety Executive (HSE) Consultation Zone which determines the distance for different types of development from a 'major hazard' based on the current gas storage use. It is proposed that this be relocated.
- The presence of contaminated land.
- The presence of underground water mains and sewers. This infrastructure needs to be protected and new development needs to ensure its operation remains unaffected.

Historic Assets

4.7.11 The Western Harbour Arm is partly within the Shoreham-by-Sea Conservation Area. The 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.

4.7.12 Also visible from the Western Harbour Arm are the Kingston Buci Lighthouse (Grade II listed) and Shoreham Fort, a Scheduled Monument.

4.7.13 There is a wealth of local maritime history that could be better interpreted in this location and there is significant potential to improve the landscaping and setting of the river. This will make the area more attractive and accessible.

Flood risk and sustainable drainage

4.7.14 The Western Harbour Arm is adjacent to the lower reaches of the River Adur where it flows into the English Channel. Given this low lying location, there are a number of potential sources of flooding which will be a key consideration in planning for the future of this area.

4.7.15 Sites along the Western Harbour Arm are vulnerable to surface water, fluvial, and, most significantly, tidal flooding, meaning that any new residential development would need to be lifted up above likely flood levels. Development will need to be protected through flood defence provision and will need to be safe for the intended building lifetime taking into account climate change and sea level rise.

4.7.16 The Adur and Worthing Councils' Strategic Flood Risk Assessment (SFRA) identifies a number of sites in this area as Tidal Flood Zone 2, 3a and Non-functional Flood Zone 3b. This latter category recognises that some sites have the same risk of flooding as Flood Zone 3a but do not have a significant storage or conveyance potential which materially impacts flood risk elsewhere. Some sites also fall within Fluvial Flood Zones 2, 3a and 3b.

4.7.17 The partnership has worked closely with the Environment Agency to develop a comprehensive vision for an upgraded flood defence network to protect a redeveloped Western Harbour Arm. The Shoreham Harbour Flood Risk Management Guide SPD (2015) and Technical Annex details about the recommended approach for this stretch.

4.7.18 Comprehensive flood defence provision will be essential to protect existing and future residents and businesses as well as the A259. This approach, which focuses on flood defence provision from the Adur Ferry Bridge to Kingston Beach, will ensure the complete closure of the flood cell and continuation of the line of new defences currently being provided via the Shoreham Adur Tidal Walls Scheme - an Environment Agency funded flood defence scheme which ends at the Adur Ferry Bridge.

4.7.19 It is essential that the new flood defence network is integrated with a high quality public realm environment that promotes a positive inter-relationship with the river. Flood defences can often physically divide one area from another therefore an important ambition for the Western Harbour Arm is to promote permeability through the entire area.

4.7.20 Developers should include SuDS and building level resistance and resilience measures as part of proposals, ensuring development is safe for its intended lifetime. The approach is set out in the following publications (or subsequent replacement documents):

- Adur & Worthing Councils and/or Brighton & Hove Council's SFRAs
- *Water. People. Places: A guide for master planning sustainable drainage into developments*
- CIRIA SuDS Manual

4.7.21 Refer to the *Shoreham Harbour Flood Risk Management Guide SPD* (2015) for full details of requirements in relation to protection from flooding.

Green infrastructure

4.7.22 The Western Harbour Arm is dominated by industrial land-uses and generally has a low diversity of terrestrial habitats.

4.7.23 The River Adur to the south includes areas of coastal saltmarsh and intertidal mudflat. These habitats form part of the wider network of intertidal habitats in the River Adur Estuary; however these are of limited extent and quality.

4.7.24 The Western Harbour Arm is adjacent to the Adur Estuary SSSI and falls within its Impact Risk Zone. Consultation with Natural England will be required in order to avoid harmful impacts on the SSI. Environmental Impact Assessment may also be required.

4.7.25 The creation of a new species rich native hedgerow along the southern boundary of The Ham would provide wildlife value but also act as a buffer to noise and pollution from Brighton Road (A259).

4.7.26 The Western Harbour Arm Waterfront is the largest of the allocations in this plan. As such, it has significant potential to provide green infrastructure enhancements and a net gain in biodiversity.

4.7.27 SuDS should be incorporated into design proposals as an integrated system during masterplanning of individual sites. This could include rain water harvesting, green walls and roofs, rain gardens, vegetated swales and porous surface materials.

4.7.28 Appropriate planting alongside Brighton Road could extend the proposed green corridor from Kingston Beach as far as The Ham and Shoreham town centre.

4.7.29 The proposed waterfront route for pedestrians and cyclists and onsite amenity open space also present significant opportunities for green infrastructure enhancement. Appropriate planting could include areas of vegetated shingle along the route, and on connections through to Brighton Road.

4.7.30 Where mitigation measures to prevent impact to intertidal habitat are not feasible, any impact or any 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.

4.7.31 Buildings should be designed to accommodate green walls (or planting) and green roofs (preferably bio-solar). These could compensate for any loss of habitats at ground level, as well as provide additional areas of vegetated shingle.

4.7.32 New residential development will generate the need for new open space provision. Some of this will be required on site. However, improvements to existing open spaces will be considered where appropriate.

4.7.33 The Shoreham Harbour Green Infrastructure Strategy will set out full details of requirements in relation to green infrastructure and biodiversity.

Development opportunities

4.7.34 Many of the business occupiers currently situated on the waterfront do not specifically need a portside location and are not dependent on access to the harbour for their operations.

4.7.35 The existing businesses provide a significant amount of employment floor-space and jobs. A key consideration for this area is the importance of working with the harbour businesses to retain them either in the port itself or within the local area in suitable, modern accommodation.

4.7.36 Shoreham Port Authority remains responsible for ensuring the river remains navigable and is periodically dredged to a level suitable for existing uses.

4.7.37 It is proposed that existing port-related uses in the Western Harbour Arm are relocated within the commercial port area in the Eastern Arm of the River Adur or the Canal. Marine-related uses that contribute to the character of the harbour could potentially remain.

4.7.38 There is currently development pressure for change along this strip as land owners seek to maximise the value of their land recognising that the location has long been earmarked for redevelopment as a new waterside community.

4.7.39 The Western Harbour Arm Waterfront allocation is made up of several sites, some of which are in multiple ownerships:

- WH1: 5 Brighton Road. This site has been purchased by a housing developer. The council is currently engaged in pre-application discussions.
- WH2: Kingston Wharf (including Kingston Railway Wharf). This site has been purchased by a housing developer. The council is currently engaged in pre-application discussions for a mixed use development.
- WH3: Egypt Wharf. This site is expected to come forward towards the end of the plan period.
- WH4: Lennard's Wharf, Fisherman's Wharf and New Wharf. This site is expected to come forward towards the end of the plan period.

- WH5 – Free Wharf. Adur District Council has granted full planning permission for a development comprising 540 dwellings and over 2,700m2 commercial floor-space.
- WH6 – 37 – 41 Brighton Road and Ham Business Centre. This site is expected to come forward towards the middle of the plan period.
- WH7 – 63 – 77 Brighton Road. This site is expected to come forward towards the middle of the plan period.

4.7.40 Development of 132 residential units and ancillary retail space at 79 – 81 Brighton Road is nearing completion.

Residential development

4.7.41 Western Harbour Arm Waterfront is a prime riverside site that could offer a vibrant mix of new uses. Development of a minimum of 1,100 new residential dwellings (use class C3) will be instrumental in delivering the sustainable transformation, enabling the creation of an attractive new setting and creating a greater sense of vibrancy along the waterfront.

4.7.42 Sites to the north of Brighton Road (A259) are outside the allocation. These sites are not considered likely to come forward within the plan period. This does not preclude appropriate mixed use development on these sites if opportunities arise within the plan period. This would support a comprehensive approach taking in both sides of the road.

Employment-generating floorspace

4.7.43 Adur District Council will require development within the Western Harbour Arm Waterfront allocation to include new employment generating floor-space as part of mixed use schemes. This should be predominantly high quality office space (use class B1a). Proposals will be encouraged to provide a range of commercial spaces in smaller format units.

4.7.44 Through the Greater Brighton City Deal, the wider Shoreham Harbour area is being promoted as a hub for environmental technology and digital media technology-related businesses. Major development proposals will be expected to incorporate floor-space designed to be suitable for such uses where appropriate.

4.7.45 Employment floor-space should be of modern, high quality design with an emphasis on providing studio style or office-based flexible workspace that could accommodate a comparatively higher number of jobs per unit of floor-space than the former industrial uses.

4.7.46 Smaller scale (preferably marine-related) leisure facilities will also be supported. These activities will play a major role in adding diversity and interest to the waterfront, and helping to generate footfall.

4.7.47 The partnership will continue to liaise with landowners and businesses to understand their ambitions and ensure that the process of land use change is managed sensitively. For example, it is understood that some operators are already considering alternative sites outside of the Western Harbour Arm for relocation purposes. However, other businesses have no immediate desire to relocate, and as such may not come forward for redevelopment until the latter part of the plan period. This plan seeks to maintain sufficient flexibility to enable a phased redevelopment approach.

4.7.48 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.

Ancillary retail uses

4.7.49 Shops, cafes and restaurants that are ancillary to new mixed-use developments have an important role to play in realising the vision for regeneration of the Western Harbour Arm. Although residential dwellings and employment generating floor-space will be the primary land use, ancillary retail development will help to bring life to the waterfront and strengthen the overall offer of Shoreham-by-Sea, complementing the town centre.

New waterfront route and open spaces

4.7.50 New developments will be expected to incorporate areas of public open space which will help to increase the accessibility and visibility of the waterfront, attract visitors to spend time in the area, provide new space for community activities and events and enhance the local environment.

4.7.51 As set out in the Shoreham Harbour Transport Strategy, development of a new, publicly accessible waterfront route for pedestrians and cyclists is proposed. The route would increase access to the waterfront by opening up previously restricted vistas and connecting Shoreham town centre and Adur Ferry Bridge with Kingston Beach and beyond framed by the attractive harbour setting.

4.7.52 The waterfront route will provide the new residential and commercial properties in the Western Harbour Arm with an attractive outlook over the harbour. The route must be well lit with appropriate signage and landscaping.

4.7.53 To accommodate the route, development must be set back from the waterfront. A setback is likely to be required for the purpose of flood risk management. Prior consent of the Environment Agency is required for any works within 16m of the tidal River Adur.

4.7.54 The waterfront route will not be complete when the England Coast Path is created through the area. This means that the trail will initially have to follow a different route. It is proposed that once the waterfront route is in place, it is adopted as part of the coast path.

Waterfront leisure facilities

4.7.55 Despite popular demand, the harbour is currently lacking in good quality, modern waterfront facilities for boat-users and for local residents and visitors to enjoy. It is proposed to increase the number of berths in the harbour for both visitors and residents through the incorporation of new publicly accessible quays or floating docks/pontoons linked to new developments and open spaces. This will significantly improve the facilities on offer for the boating community and attract visitors into the area, supporting the local economy. All new features would be subject to the appropriate environmental approvals processes with the relevant statutory bodies.

Improved connections and streetscape

4.7.56 As shown in Map 12, a series of new north-south connections from the waterfront route to Brighton Road (A259) are proposed. The exact form and function of these will depend on a number of factors. In some cases, these links may be pedestrian or cyclist only, whilst others will enable site access or direct connections to the waterfront.

4.7.57 The incremental introduction of mixed use development to the south of the road will be a trigger for the gradual enhancement of the A259 corridor to ensure that conditions for pedestrians and cyclists are improved.

4.7.58 There is considerable scope for highways interventions such as public realm and streetscape improvements and improved crossing facilities. Landscaping treatments will also be important for creating setbacks between new developments and the A259 corridor to prevent noise and air quality impacts.

Social and Community Infrastructure

4.7.59 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 SH10 in Section 5. Social and community infrastructure requirements include:

Childcare / Early Years Provision

4.7.60 Additional childcare places will be required through financial contributions for expanding local provision delivered by private, voluntary and independent childcare providers.

Health and Medical Services

4.7.61 Health infrastructure providers have identified the need to replace the existing Shoreham Health Centre in Pond Road. The present 1960s building is of a poor quality and expensive to maintain being unsuitable for modern healthcare delivery. New development on the Western Harbour Arm will be expected to contribute towards improvements.

Education

4.7.62 The project partners are working together to address the need for suitable education provision in the Shoreham area, arising from growth. Existing primary schools are nearing capacity with planned improvements, and opportunities for further expansion are limited. Work is being undertaken to ensure any feasible opportunities to increase capacity at existing schools in the area can be brought forward during the plan period or if other sites can be identified. If not, innovative solutions to address need will be considered by all authorities.

Library Provision

4.7.63 The library offer will need to be improved or expanded to facilitate the development at the Western Harbour Arm. Infrastructure providers are considering the potential for a new library facility at Pond Road in Shoreham as part of a comprehensive redevelopment of the site including the provision of new healthcare facilities.

Facilities for Young People and Teenagers

4.7.64 Mixed-use developments will be expected to incorporate features and facilities that attract young families such as play areas and leisure uses. There may be opportunities to improve the existing skate park at The Ham as part of new developments in the vicinity.

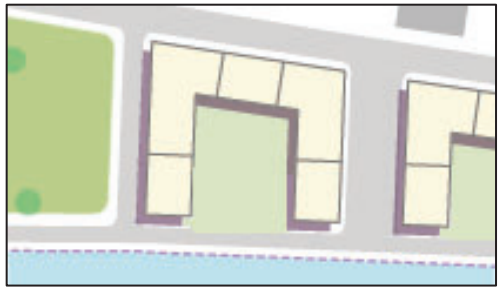
Emergency Services

4.7.65 Contributions towards emergency services, including the police and the fire and rescue services will be required as a result of development at the Western Harbour Arm. Sussex Police has identified the need for improved accommodation and equipment in the Shoreham area. The West Sussex Fire and Rescue Service has identified the potential need for new or improved facilities.

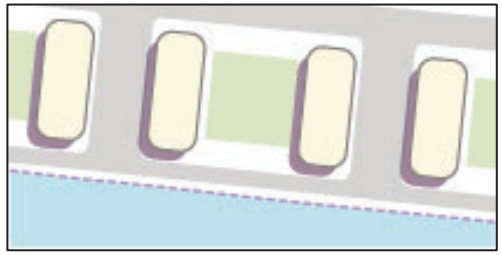
Development form and typology

4.7.66 It is important to avoid a single development form being repeated across the whole allocation. Buildings should be oriented to maximise views across the river. However, the exact form is partly dependent on the depth of the site and the mix of uses. The following potential typologies are recommended:

- It is proposed that deeper sites (WH4, WH5) are arranged as horseshoes of flatted development. Employment floorspace on lower storeys will provide a frontage to Brighton Road (A259). The residential layout will maximise views across the river.



- It is proposed that narrower sites (WH2, WH3) are arranged as pairs of north-south blocks. Employment floor-space will be provided on lower storeys. This will also maximise views across the river.



4.7.67 Mixed employment space should be incorporated into development across allocation Western Harbour Arm Waterfront. Sites should be designed in an urban format with parking at lower levels and trading areas above.

4.7.68 Site WH1, at the eastern end of the Western Harbour Arm Waterfront, has the dual function of forming a strong edge to Kingston Beach, helping to define the space, and to mark the gateway to the Western Harbour Arm. A key consideration here is the potential navigational impact of residential development. Discussions will be required with Shoreham Port Authority at an early point in the design process to ensure navigational issues are addressed.

4.7.69 The Western Harbour Arm Waterfront will be a high density neighbourhood. In general, buildings should be developed up to 5 storeys on the Brighton Road (A259) and River Adur frontages. Within deeper sites, heights could step up away from these frontages.

4.7.70 The *Western Harbour Tall Buildings Capacity Study* (2017) has identified a number of significant views that should be protected, and heritage assets that should be considered as part of development proposals:

- Kingston Buci lighthouse is Grade 2 listed and is a prominent landmark signalling the entrance to the harbour, and to the town of Shoreham-by-Sea from the west. Development of over 3 storeys at sites WH1 and WH2 has the potential to impact the setting of the lighthouse. This must be considered when preparing development proposals.
- There are several views from Shoreham Beach to the South Downs. Development of sites WH2, WH3, WH4 and WH5 should ensure that views are retained.

- St Mary de Haura church is the most prominent landmark in the town centre. Most development sites are not close enough to significantly impact the prominence of the church. However developers should consider the potential impact on views of the church.

4.7.71 Significantly taller buildings could create issues, such as traffic congestion, infrastructure provision and creation of a microclimate through trapping of air pollutants. Towards the centre of the allocation (western part of site WH3, site WH4 and eastern part of site WH5), there may be scope for taller buildings provided that it can be demonstrated that these issues have been addressed, and the proposal is of exceptional design quality.

4.7.72 The findings from the Objectively Assessed Need for Housing: Adur District study undertaken in 2015 identifies a limited demand for dwellings with four or more bedrooms. The focus of provision of market housing in Adur should be on two and three bedroom housing both for younger households and older households wishing to downsize. The provision of smaller dwellings should be focussed in and around town centres and Shoreham Harbour.

4.7.73 For Shoreham Harbour specifically, there is an opportunity to provide a mix of properties, including one, two and three bed homes as part of a higher density development. The majority of dwellings delivered at Shoreham Harbour will be flatted development. Some sites may be able to accommodate up to ten per cent of dwellings as terraced housing. At the Western Harbour Arm Waterfront there is an opportunity to provide a mix of properties, including one, two and three bedroom homes as part of a high density development. Across the allocation as a whole, the following mix is considered suitable:

- 35% - 1 bed
- 60% - 2 bed
- 5% - 3 bed

4.7.74 The Western Harbour Arm allocation is identified in the Shoreham Harbour District Energy Feasibility Study (2018) for the planned Shoreham Heat Network. This aims to provide low carbon, affordable warmth to residents and businesses. The district heating project is being developed by the Shoreham Heat Network Partnership, comprised of Shoreham Harbour Regeneration Partnership, Adur District Council, West Sussex County Council and Shoreham Port Authority.

4.7.75 New development in and around the Western Harbour Arm will be required to connect to the proposed network once complete. Development coming forward before the heat network is delivered is required to be connection ready, and to connect once the network is in place. Planning conditions and obligations will be applied to other development in order to futureproof connection at a later date.

Policy CA7: Western Harbour Arm

1. **Western Harbour Arm Waterfront is designated as a mixed use area (Allocation Western Harbour Arm Waterfront).**
2. **The partnership will work with developers and stakeholders to secure a comprehensive redevelopment of the Western Harbour Arm Waterfront. This will deliver a minimum of 1,100 new homes (use class C3) and a minimum of 12,000m2 new employment generating floor-space (predominantly use class B1a) on the southern side of Brighton Road (A259) within the plan period. Smaller scale retail outlets, food and drink, and marine-related leisure facilities are also encouraged.**
3. **Proposals for sites WH1 and WH2 will be required to demonstrate that potential implications for the navigational safety of vessels entering and leaving Shoreham Port have been addressed in agreement with statutory bodies, including Shoreham Port Authority. In particular, development proposals must demonstrate that artificial lighting originating from proposed development will not impact the visibility of navigation lights in the harbour mouth.**
4. **The councils will support the development of the Shoreham Heat Network. Until the network is constructed, development will be required to incorporate the necessary infrastructure for connection to future networks. When the network is constructed, development will be required to connect.**
5. **Development proposals for sites to the south of Brighton Road (A259) should not unduly prejudice the potential future development of sites to the north of Brighton Road (A259) and vice versa.**
6. **New developments should incorporate active uses along the waterfront. This may include the provision of parks, squares, play areas and active frontages such as cafes, shops and workspace.**
7. **New development should achieve residential densities of a minimum of 100 dwellings per hectare consisting of predominantly flatted development. A mix of dwelling sizes should be delivered.**
8. **Building heights of up to five storeys are generally considered acceptable on the Brighton Road and River Adur frontages. Away from these frontages, greater storey heights may be acceptable within deeper sites. At sites WH1 and WH2, the setting of Kingston Buci lighthouse must be considered if development over 3 storeys is proposed. At sites WH2, WH3, WH4 and WH5 views from the coast at Shoreham Beach to the South Downs must be retained.**

9. **Taller buildings may be considered in the centre of the allocation (western portion of site WH3, site WH4 and eastern portion of site WH5). Proposals will be required to demonstrate an appropriate response and high quality design in relation to the following elements:**
   - **Scale and height**
   - **Architectural detailing**
   - **Materials**
   - **Public realm and open space**
   - **Public transport accessibility**
   - **Views into and out of the area, including assessment of glimpse views, local views and long views in relation to the waterfront, local landmarks, the South Downs National Park, conservation areas, and historic assets.**
   - **Microclimate impacts including wind, daylight and sunlight effects, air pollution and urban heat island effects.**

10. **Development should respect and connect with surrounding areas, in particular protecting and enhancing the views from Shoreham Beach, protecting views of St Mary de Haura Church, Kingston Buci lighthouse and better connecting with Shoreham town centre's historic core.**

11. **Where appropriate, proposals will be expected to enhance townscape around key linkages and junctions, in particular Shoreham High Street/Norfolk Bridge (A259) – Old Shoreham Road (A283), Brighton Road (A259) – New Road – Surry Street, and Brighton Road (A259) – Ham Road.**

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

13. **Developments should be set back sufficiently from the A259 corridor in agreement with the highways and planning authorities, to provide space for a high-quality segregated cycle route which provides stepped separation from road vehicles and pedestrian facilities, to deliver green infrastructure improvements, and to prevent a canyoning effect to ensure that residents are protected from noise and air quality impacts.**

14. **Prior consent is required for any works in, under or over the River Adur Tidal, a classified 'main river' under the jurisdiction of the Environment Agency, and subject to its byelaws, or within 16 metres of the landward toe.**

15. **The partnership will support and identify mechanisms for implementation of ecological and landscaping improvements along the waterfront route and alongside Brighton Road (A259) to extend the green corridor.**

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

17. **Where open space requirements cannot be met on site, development will be expected to contribute towards the creation of the proposed green corridor along the A259, and/or existing open spaces, such as The Ham and Kingston Beach.**

18. **Major waterfront development schemes will be expected to actively respond to the marine/estuarine environment in terms of their design and layout and incorporate features that improve open access to the waterfront and facilities for boat users such as additional moorings, floating pontoons/docks and slipways. Access to existing public hards must remain.**

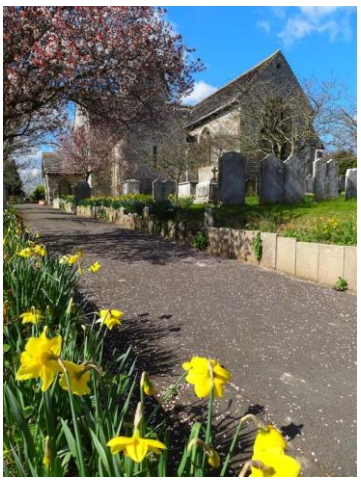
19. **Management agreements should be included as part of the planning application for sites of compensatory habitat to ensure the long term integrity for wildlife benefit.**

20. **The partnership will work with developers and stakeholders to deliver the package of transport measures for the Western Harbour Arm as set out in the Shoreham Harbour Transport Strategy. Critical measures include:**

- **New waterfront route for pedestrians and cyclists between Shoreham Town Centre and Kingston Beach.**
- **Improvements to the following junctions:**
  - **Brighton Road/Norfolk Bridge (A259) – Old Shoreham Road (A283)**
  - **Brighton Road (A259)/Surry Street**
  - **Brighton Road (A259)/South Street (A2025)**
- **Improvements to the cycling facilities along the A259.**
- **Improved pedestrian and cycle crossing points.**
- **Bus stop improvements.**

Adur Local Plan 2017









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Infrastructure requirements are to be addressed through s106/CIL/ planning conditions as appropriate.

SHOREHAM HARBOUR REGENERATION AREA: BROAD LOCATION POLICY

2.88 Shoreham Harbour Regeneration Area is identified in this Local Plan as a broad location for change (see Policies Map). To maximise the opportunities offered by this diverse waterfront location the Council is working as part of the 'Shoreham Harbour Regeneration Partnership' (jointly with Brighton & Hove City Council, West Sussex County Council and the Shoreham Port Authority) to prepare a Joint Area Action Plan (JAAP) to guide the revitalisation of the area. The JAAP will contain detailed proposals as to how the area could be developed up to 2032 and a planning framework to guide investment and delivery. A minimum of 1,100 new dwellings (in the Western Harbour Arm) and a minimum of 16,000 sqm of employment generating uses (12,000 sqm in the Western Harbour Arm and 4,000sqm in Southwick Waterfront) are promoted within the Shoreham Harbour Regeneration Area in Adur District during the plan period to 2032.

Context

2.89 Shoreham Harbour is an attractive location benefitting from a natural coastal setting and accessible waterfront environment. The harbour stretches for five kilometres of waterfront bounded to the north by the A259 south coast road, the West Coastway railway line and the coastal communities of Shoreham-by-Sea, Kingston-by-Sea, Southwick, Fishersgate, South Portslade and Hove. The harbour occupies a strategic economic location in the south-east region with Brighton and Shoreham-by-Sea readily accessible by quick road and rail journeys and Gatwick Airport and London within an hour away.

2.90 The harbour boasts a wealth of maritime history dating back to Roman times. It has a rich and diverse landscape including the Adur Estuary SSSI, historic landmarks including Shoreham Fort and Kingston Beach lighthouse, a number of established residential communities and Shoreham Port as a highly engineered, operational environment.

2.91 Given the sensitivities of the area in terms of its environmental designations, heritage features, coastal location and its function as a working port, it is important that the area is planned comprehensively through the JAAP process.

2.92 Working closely with the Port Authority there is an opportunity to bring underused sites back in to active use for new employment and housing developments, raise the quality of community spaces and improve waterfront access. The development plans for the harbour are driven by an underperforming coastal economy, the need for port modernisation and consolidation and the increasing challenge of finding strategic growth sites given the physical constraints of the sub-region.

2.93 The aims of the plans for Shoreham Harbour over the next 15 - 20 years are:

- To maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port users and visitors through a long term regeneration strategy.
- To deliver a series of appropriately located, high quality, sustainable, mixed-use developments including new housing, employment space, leisure opportunities, improved public realm and associated infrastructure including flood defences and measures to encourage the use of sustainable transport.
- The consolidation and enhancement of the operations of Shoreham Port, recognising the vital role it will continue to play in the local economy.

2.94 This policy applies to the areas of the harbour that fall within Adur District. There is a similar policy in the Brighton & Hove City Plan (Policy DA8) which covers the areas that fall within Brighton & Hove.

Background

2.95 The regeneration of Shoreham Harbour has been an objective of the local authorities and the Port Authority for a number of years. In 2006, a re-appraisal of a previous regeneration project (known as "Shoreham Maritime") by the South East England Development Agency (SEEDA) and the Shoreham Port Authority concluded that a comprehensive mixed-use scheme covering a wider area than just the Port itself and providing up to 10,000 homes and 8,000 jobs could be viable.

2.96 These aspirations for a Shoreham Harbour Regeneration Area were subsequently identified in the (now revoked) Regional Spatial Strategy for the South East (May 2009) (known as the South East Plan). This indicated the Sussex Coast as a priority area for regeneration (SCT2) and specifically identified Shoreham Harbour as a Growth Point (SCT1). The harbour was one of three sites in Adur District described as requiring coordinated action to unlock economic development potential (Policy SCT3). An interim figure for testing of up to 10,000 dwellings was identified subject to feasibility analysis.

2.97 Since this time technical studies have concluded that the capacity of the harbour to deliver new housing land is significantly less than 10,000 dwellings. This is mainly due to the high costs of reclaiming land from the sea (that would have enabled additional development space to be accommodated) not being financially viable. There were also concerns about the impact on coastal processes, environment and character of the local area as well as loss of employment land that would have been required to accommodate that level of housing. The current level and mix of development being proposed is a more viable proposition with the realistic potential of being delivered within the plan period. Technical evidence underpinning the scale of development will be outlined in detail in the emerging JAAP.

2.98 The release of sites at the harbour for redevelopment is a long term process which requires careful management. The successful delivery of the JAAP

proposals will be dependent upon the ability of the local authorities to work positively with existing site owners and businesses during this period of transition. There is a strong commitment from the Partnership to ensure that any release of sites is backed up by an accompanying strategy which minimises impact on existing business operations and retains local firms and associated jobs in the area.

2.99 It is essential to ensure that the initial phases of development do not compromise the operations of businesses on sites which are unlikely to come forward until later in the process. In accordance with the Shoreham Harbour Interim Planning Guidance, and the Western Harbour Arm Development Brief 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.

2.100 As well as addressing the needs of existing businesses, a central aim of the JAAP is to facilitate the reconfiguration of underused and vacant industrial areas for a more efficient use of the space to provide new residential and employment generating uses such as office space, restaurants, cafes, leisure, entertainment and tourism related uses. Shoreham Harbour falls outside of the town centre boundaries and as such proposals for town centre uses which are not small-scale or ancillary to other uses must be in accordance with Policy 11 of this Local Plan and will be assessed in accordance with the National Planning Policy Framework sequential and impact tests.

2.101 In 2010 the Port Authority adopted a Port Masterplan setting out its plans for future growth. The Masterplan has been subject to public consultation and endorsed by the three local authorities. The activities of the Port – particularly its potential as a hub for renewable energy regeneration - represent a key economic advantage for the area. The delivery of the Port Masterplan is vital to the success of the wider regeneration of the area which relies on the consolidation of port uses into the eastern part of the port.

2.102 Shoreham Port is important regionally for the landing, processing and handling of minerals and as such minerals wharves are safeguarded under 'Policy 40 – Wharfage' of the West Sussex Minerals Local Plan (2003). The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (2013) include Policy WMP 15 which safeguards the overall mineral capacity in ports subject to no net loss of capacity rather than specifically safeguarding individual sites. As a result development proposals affecting minerals wharves are required to demonstrate that there is no net loss of capacity for handling minerals within the port. A similar policy is likely to be included within the emerging updated West Sussex Minerals Local Plan being prepared in partnership with the South Downs National Park.

2.103 A Transport Study has modelled the impacts on the highway network of the proposed future development at the harbour as well as the other strategic site allocations within this plan. This study found that the scale of development being promoted can be accommodated subject to mitigation measures to key junctions and it being supported by a package of sustainable transport

initiatives. The outcomes of the modelling work have been taken forward as the Shoreham Harbour Transport Strategy which will guide the provision of transport infrastructure in the area for the next 15-20 years.

2.104 Parts of the Shoreham Harbour Regeneration area are vulnerable to surface water, fluvial, and more significantly tidal flooding. Working closely with the Environment Agency, a significant amount of background work has been undertaken to establish the standards of protection that new developments will need to meet in order to protect from flooding. A Flood Risk Management Guide has been prepared which sets out the vision for a comprehensive flood defence solution integrated as part of a new landscaped, waterfront route. Currently the Western Arm falls outside of the Shoreham Adur Tidal Walls Scheme, therefore alternative sources of infrastructure funding are being sought to reduce flood risk in the area through new flood defences.

2.105 The Partnership will continue to work closely with Southern Water to ensure that Waste Water Treatment infrastructure is fit for purpose to accommodate future population increases. An assessment of the capacity of the Waste Water Treatment works at Shoreham Harbour has been undertaken concluding that the existing plant has sufficient capacity to accommodate the levels of development being proposed through the Local Plan, Brighton & Hove City Plan and the JAAP. However, changes to environmental regulation requirements may have implications for future land take and an alternative site may need to be identified. The possible need for site expansion in the vicinity of Shoreham Harbour will be explored through the emerging JAAP in close liaison with Southern Water and the Port Authority.

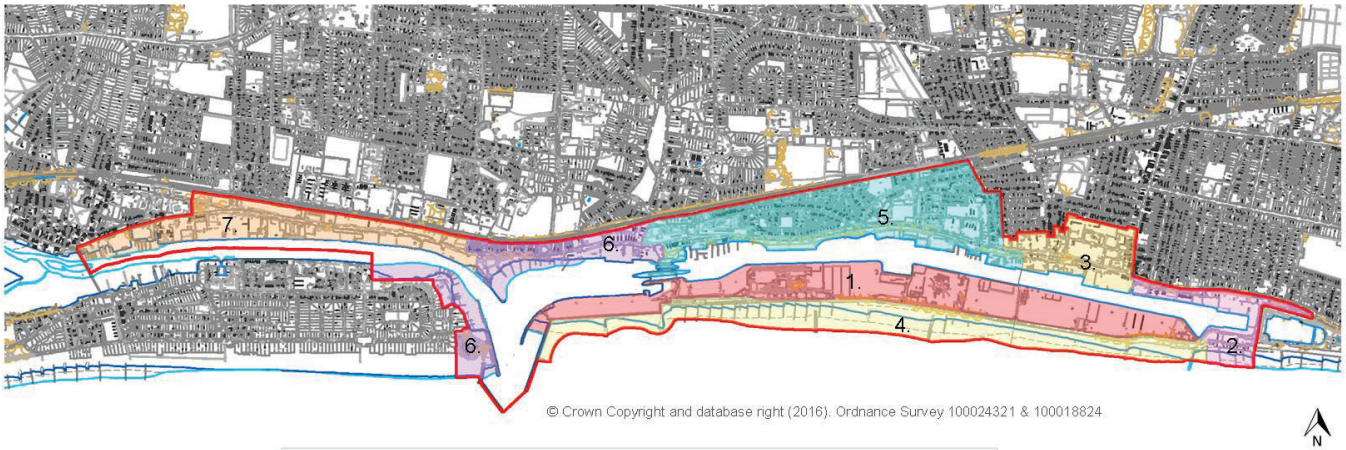
2.106 The current plans for the harbour aim to provide a pragmatic balance between the aspirations and ambitions for a new waterfront community and the commercial realities of bringing forward complex, brownfield sites under current market conditions. Viability appraisal underpinning the emerging plans have helped to identify the significant costs of critical, enabling infrastructure – such as flood defences, highways improvements and site assembly costs. The Partnership is also continuing to work closely with stakeholders and local service providers to identify social infrastructure needs and priorities. The Partnership is proactively seeking ways to reduce viability gaps and unlock stalled sites, for example through applying for infrastructure funding and working closely with the Environment Agency and Highways England to identify requirements and delivery mechanism options.

2.107 The planning process is supported in parallel by an internal Delivery and Investment Strategy which includes a work programme for engaging with landowners and developers to deliver the regeneration proposals that will underpin the emerging JAAP. Full details of infrastructure requirements for the harbour area will be set out in the Infrastructure Delivery Plans (IDP) that underpins both the Adur Local Plan and the Brighton & Hove City Plan.

2.108 The broad location policy below sets out the high level strategy and approach to future planning at the harbour based on a deliverable scale of development which aims to protect the economic opportunities offered by the Port and the

environment of the local area. The detail of the proposals and associated planning policies will be set out in the JAAP to be jointly adopted by Adur District Council and Brighton & Hove City Council and endorsed by West Sussex County Council.

Map 1: Shoreham Harbour Regeneration Area (See Policy 8)



Key:

1. South Quayside
2. Aldrington Basin (see Brighton & Hove City Plan)
3. North Quayside / South Portslade (see Brighton & Hove City Plan)
4. Southwick and Portslade Beaches
5. Southwick Waterfront and Fishersgate
6. Harbour Mouth
7. Western Harbour Arm

Policy 8: Shoreham Harbour Regeneration Area

Shoreham Harbour Regeneration Area (as shown on the Policies Map) is identified as a broad location for change. Adur District Council will work in partnership with Brighton & Hove City council, West Sussex County Council and Shoreham Port Authority to support the regeneration of the area.

The regeneration partnership will prepare a Joint Area Action Plan (JAAP) for the regeneration area. The plan will jointly be adopted by Adur, Brighton & Hove and West Sussex County Councils.

The JAAP will include a spatial strategy, area-wide policies, and specific proposals for individual character areas within the regeneration area. The plan will be underpinned by a delivery strategy to address a range of issues, including the provision of infrastructure.

The Council will encourage developments that are consistent with the vision, strategic objectives and area priorities in the JAAP.

The Council will facilitate the delivery of a minimum of 1,100 new dwellings and a minimum of 16,000sqm of employment generating uses (including B1 uses) within that part of the Shoreham Harbour Regeneration Area Western Harbour Arm during the plan period to 2032 (as shown on the Policies Map). A minimum of 16,000 sqm of employment generating uses (including B1 uses) will also be provided up to 2032.

Public open space, community uses and small-scale ancillary retail, restaurants and cafes, leisure, and tourism uses will also be provided as part of a sustainable, new waterfront development. Suitable education provision will be made.

The Council will work closely with existing site owners and businesses to identify their needs, support their future aspirations and facilitate relocations to suitable sites either within the consolidated harbour or elsewhere in the local area.

New development at the harbour will be expected to meet high standards of environmental efficiency and a Sustainability Statement will be required as supporting information to accompany all development proposals in the parts of the Shoreham Harbour Regeneration Area within Adur. The Sustainability Statement should be set out in accordance with the Sustainability Statements Guidance Note for Shoreham Harbour Regeneration Area.

Development will be expected to incorporate low and zero carbon decentralised energy generation, in particular heat networks, and required 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.

All development will be required to protect and enhance the area's important environmental assets and wildlife habitats and in particular minimise impact on the Adur Estuary SSSI. As part of new development, north-south links will be improved to enhance access to greenspace in the rest of Adur including the South Downs National Park.

A Transport Strategy for Shoreham Harbour has been produced to mitigate impacts on the highway network and to promote sustainable travel behaviours. Development in this location should contribute to the delivery of measures identified in the Transport Strategy.

All new development proposals must take into account contaminated land, local noise and air quality impacts and improvements should be sought wherever possible.

Until the JAAP is adopted, the Port Masterplan, Interim Planning Guidance, Development Briefs and this policy will be material considerations in determining applications within the harbour.

<u>Area Priorities</u>
An area vision and detailed proposals will be defined for the seven Character Areas within the regeneration area through the JAAP process.[21]

Character Area 1: South Quayside

Area Priorities:

- **To support Shoreham Port Authority in improving operational efficiencies, developing new trade and exploring opportunities for sustainable energy generation, in line with the adopted Port Masterplan.**
- **To accommodate the relocation of existing port operators from elsewhere within the Port.**
- **To identify and where appropriate accommodate the future capacity requirements for the Waste Water Treatment Plant.**
- **To improve Basin Road South as a popular recreational route for walking and cycling, providing access to the beaches.**
- **With the exception of the existing Power Station, renewable energy generation (such as solar or wind) and the Waste Water Treatment Plant, non-port operations will not be permitted in this area.**

[21] Two of the Character Areas (1 – South Quayside (Port Operational) and 4 -Southwick and Portslade Beaches) straddle the boundary with Brighton & Hove and are therefore included in both Local Plans. Character Areas 2-Aldrington Basin and 3-North Quayside / South Portslade are entirely within Brighton & Hove and therefore addressed in the Brighton & Hove City Plan. The Character Areas have been adapted from those within the Port Masterplan for consistency.

Character Area 4: Southwick and Portslade Beaches

Area Priorities:

- **To seek improvements to the quality, access, appearance and maintenance of the Public Right of Way corridor, beach promenade, public areas and beach environment.**

Character Area 5: Southwick Waterfront and Fishersgate

Area Priorities:

- **To designate Southwick Waterfront as a strategic employment area.**
- **To support the comprehensive redevelopment of Southwick Waterfront to accommodate a mix of new and improved employment uses (classes B1, B2 and B8).**
- **To safeguard and develop port operational areas to accommodate new and relocated port uses with limited land reclamation and a new access road (within the port boundary) in line with the Port Masterplan.**
- **To support the comprehensive reconfiguration of Lady Bee Marina.**
- **To address deprivation through partnership working with Action Eastbrook Partnership and local service providers.**
- **To improve sustainable transport links with surrounding communities.**
- **To support improvements to local community facilities, including enhancing Fishersgate recreation ground.**
- **To enhance biodiversity by creating and improving habitats and improved green infrastructure links, including landscape enhancements to social housing estates.**

Character Area 6: Harbour Mouth

Area Priorities:

- **To support the conservation of Shoreham Fort.**
- **To enhance connections between Shoreham town centre, Shoreham Beach and Shoreham Fort through environmental and landscaping improvements.**
- **To support the redevelopment of Shoreham Rowing Club and enhance the public realm environment of Kingston Beach.**

Character Area 7: Western Harbour Arm

Area Priorities:

- **To designate the Western Harbour Arm (Waterfront) as a strategic mixed-use area.**
- **To facilitate the comprehensive redevelopment of the Western Harbour Arm (Waterfront) to become an exemplar sustainable, mixed-use area (classes B1 and C3).**

- **To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, ensuring to respect and complement the character of surrounding areas.**
- **To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces.**
- **To facilitate the strategic relocation of industrial uses to elsewhere in the Port or local area to free up waterfront opportunity sites.**
- **To improve access arrangements to create better linkages with Shoreham town centre and surrounding areas.**
- **To improve connections around key linkages including Shoreham High Street/Norfolk Bridge (A259) – Old Shoreham Road (A283), Brighton Road (A259) – New Road – Surry Street, and Brighton Road (A259) – Ham Road.**
- **To deliver a comprehensive flood defence solution integrated with a publicly accessible riverside route including pedestrian/cycle way and facilities for boat users.**
- **To enhance the area's natural biodiversity by incorporating multi-functional green space, creating and improving habitats and improved green infrastructure links.**