PROPOSED CHANGES TO LAYOUT AT EXISTING WHARF, INCORPORATING THE ERECTION OF OFFICES AND WELFARE FACILTIES, FEED CONVEYOR, HOPPER AND STORAGE BAYS; REPOSITIONING OF BOUNDARY WALL, WEIGHBRIDGE, ACCESSES AND CAR PARKING; AND ASSOCIATED ALTERATIONS FOLLOWING THE DEMOLITION OF EXISTING OFFICE BLOCK AND BOUNDARY WALL

CEMEX BRIGHTON WHARF (HALLS WHARF), BASIN ROAD NORTH, PORTSLADE, BN41 1DN

PLANNING STATEMENT

May 2019

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Submitted documents:

- Application form
- Fee of £6006
- Location Plan
- Existing and Proposed Layout Plans
- Proposed Elevations Plan
- Proposed Floorplans
- Planning Statement
- Air Quality Assessment
- Flood Risk/Sustainable Drainage Assessment
- Biodiversity Checklist

1. INTRODUCTION

1.1. The following written statement has been prepared by CEMEX UK Operations Ltd (the Applicant) in support of its application for the following development:

PROPOSED CHANGES TO LAYOUT AT EXISTING WHARF, INCORPORATING THE ERECTION OF OFFICES AND WELFARE FACILTIES, FEED CONVEYOR, HOPPER AND STORAGE BAYS; REPOSITIONING OF BOUNDARY WALL, WEIGHBRIDGE, ACCESSES AND CAR PARKING; AND ASSOCIATED ALTERATIONS FOLLOWING THE DEMOLITION OF EXISTING OFFICE BLOCK AND BOUNDARY WALL

1.2. The application site is within both Brighton and Hove and West Sussex/Adur District Council areas. The larger part of the site (6489m^2 approx.) falls within Brighton and Hove Council area, compared to 5263m^2 approx. within the West Sussex County/Adur District Council boundary. In line with the relevant guidance, and advice received from West Sussex County Council, an identical application has been submitted to both authorities but the fee paid to Brighton and Hove, given that it contains the larger part of the site.

1.3. The planning fee for the proposed development is set by the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 and has been calculated as £6006. While it could fall within categories 2, 5, 10 & 12 of the fee regulations, the largest fee is calculated under Category 5 – Erection/alteration/replacement of plant and machinery and as such this is the correct fee. In addition, as it is a cross-boundary application, the sum of the two parts within the two counties is smaller than 150% of the fee for the site as a whole (which would be £8316), so the lesser fee is payable. This approach is advised in paragraphs 034 and 035 of the Planning Practice Guidance: Fees for planning applications.

1.4. This written statement provides a detailed description of the proposal. It forms part of the planning application which also includes the application forms, certificates, notices, plans and accompanying Air Quality and Flood Risk Assessments.

1.5. This is a full planning application and complies with all the relevant legal requirements and principles of best practice. In policy terms it complies with the requirements of the National Planning Policy Framework (NPPF) and the relevant local plans.

2. THE APPLICANT

2.1. CEMEX UK Operations is a leading global producer and marketer of cement, concrete and other building materials. In the UK it is the leading producer of ready-mix concrete and the second largest manufacturer of aggregates. It is the third largest cement and asphalt producer, with a significant share of the roof-tile, concrete block markets. It is the leading supplier of concrete sleepers to the UK's rail industry and a dominant supplier of pulverized fuel ash cement additives.

2.2. CEMEX controls and operates around fifteen wharfs in England and Wales, which receive and process marine dredged aggregate, as well as a large number of quarries and concrete plants throughout the UK.

2.3. In carrying out its business operations, CEMEX has demonstrated a positive attitude towards the environment. Restoration schemes can typically result in the creation of additional wildlife habitats, the enhancements of existing ones and improvements to the landscape. In both biodiversity and landscape terms CEMEX's quarrying activities result in significant environmental benefits.

2.4. In 2007, CEMEX signed a global 'Memorandum of Understanding' with BirdLife International. The BirdLife International partner in the UK is the Royal Society for the Protection of Birds (RSPB). In October 2009, CEMEX and the RSPB commenced a partnership, with a RSPB advisor dedicated to CEMEX to provide biodiversity-focused restoration advice. This complementary relationship is intended to help drive CEMEX's improvement of its biodiversity management at a more local level. In 2010, CEMEX published its Biodiversity Strategy 2010 – 2020 which can be downloaded at http://www.rspb.org.uk/images/strategy tcm9-262356.pdf.

2.5. With the support of the RSPB, CEMEX has committed to challenging targets covering its operations in the UK, including the creation and maintenance of 1,000 hectares of priority habitats by 2020. This is the equivalent to approximately 100 hectares per annum and represents a major investment in protecting nature and wildlife for future generations to enjoy.

3. SITE DESCRIPTION AND HISTORY

3.1. Historical mapping shows that there has been a wharf in this location since at least the 1930s. The site has previously been known as Esso Wharf and as Halls Wharf, and Cemex also operated Lennards Wharf, Roadstone Wharf and Kingston Wharf in the vicinity. Lennards Wharf was amalgamated with Esso Wharf on this site in the 1980s.

3.2. The site is accessed from Basin Road North, south of the A259, approximately 3km west of central Brighton. The western half of the site lies in West Sussex county and the eastern half in Brighton and Hove. The wharf and processing site is 1.17 ha in size, and Cemex also owns and operates a concrete plant immediately to the west, which is outside this application boundary of this proposal.

3.3. The site has a large processing plant on the northern boundary which is unaffected by this application. Within the site, there are a number of stockbays, an office block and container office, weighbridge and storage areas. The site is enclosed by a concrete wall along the northern boundary with a number of parking spaces along the northern side of the boundary. The existing access to the site is immediately west of the office block.

3.4. The site is bordered by the River Adur to the south, and otherwise is surrounded by industrial and commercial land uses, including to the north of the A259 Wellington Road. The nearest residential uses appear to be approximately 100m further north along St Richard's Road and Brambledean Road. The site lies within Flood Zones 2 and 3.

4. RELEVANT PLANNING HISTORY

4.1. While there has been a wharf on the site since the 1930s, the planning history is limited before the 1970s and 80s.

4.2. Planning permission 3/86/002 was granted by East Sussex in June 1986 for the processing and storage of marine dredged aggregate and the distribution of graded material, and the processing, batching and distribution of ready-mix concrete (on the adjacent site in the blue line). Planning permission SW/10/85 was granted in May 1986 by West Sussex for the same development including the relocation of Lennards Wharf.

4.3. Planning permission SW/22/87 was granted by West Sussex in July 1987 for the retention of the access.

4.4. Planning permission SW/80/87 was granted by West Sussex in February 1988 for the use of the wharf for the landing, processing and distribution of marine dredged aggregates and the manufacture of ready mixed concrete including the use of existing buildings and erection of plant and machinery. Planning permission 3/87/660 was also granted in February 1988 for the same development by East Sussex.

4.5. Planning permission SW/36/88 was granted in May 1988 by West Sussex for the retention of a container building adjacent to the existing workshops.

5. PROPOSED DEVELOPMENT

5.1. This proposal seeks to make rearrangements to the layout of the existing wharf. This is to make the layout more modern and efficient, to improve safety and vehicle flow throughout the site, and so the site can accommodate receiving aggregate from a new dredger.

5.2. The main changes between the existing and proposed layouts are as follows:

- New stockbays in the south-east corner to accommodate the new dredger
- New feed conveyor and ready-mix feed hopper along the southern boundary
- Demolition of the existing office building and erection of new offices/welfare facilities and meeting room
- Demolition of part of the northern boundary wall and construction of a replacement wall and access gates slightly further to the north
- Relocation of existing car parking spaces within the site
- Relocation of accesses and creation of separate car and lorry accesses
- Relocation and installation of new weighbridge and office

5.3. The new portacabin offices would comprise washrooms, an office and canteen on the ground floor, and separate aggregates and haulage offices on the first floor. They would have external staircases each and between the offices. There would be a separate portacabin to the west of the car park with a meeting room on the ground floor, with a further office for ready-mix on the first floor, with an external staircase. These buildings would be arranged around the new car park, with a 1.8m palisade fence separating this area from the rest of the site, creating a safe compound for staff and visitors and separate car and lorry routes within the site.

5.4. The new concrete panel fence along the northern boundary would adjoin the existing fence, and be approximately 2.1m in height, the same as the existing concrete panel fence, with gates of 1.8m to the office compound (for cars) and to the aggregate plant (for lorries).

5.5. The new stockbays would have walls of approximately 3.25m in height to accommodate the dredged aggregate. The transfer conveyor would be 1.8m from the ground with the new readymix feed hopper 3.8m in height.

5.6. The change in layout will not result in the loss of any car parking spaces nor the intensification of the site or an increase in vehicle movements. The layout changes are for modernisation, efficiency, and safety reasons and to accommodate the new dredger. The existing site is controlled by conditions imposed via planning permissions SW/80/87 (West Sussex) and 3/87/660 (East Sussex), and as such it is not considered that the majority of these conditions would have to change as a result of this proposal.

6. PLANNING POLICY ASSESSMENT

Policy Framework

6.1. This section summarises the policy relevant to the consideration of the application. When determining planning applications, the authority should have regard to the provisions of the Development Plan so far as material to the application, as well as national and regional planning policies, and any other material considerations.

National Planning Policy Framework (NPPF)

6.2. The revised NPPF was published in February 2019 and sets out the Government's planning policies for England and how these should be applied, in plan making and decision taking.

National Planning Practice Guidance (PPG) and Policy Statements

6.3. The PPG adds further context and detail to the NPPF. The *National Policy Statement for Ports 2012* and the *UK Marine Policy Statement 2011 (UKMPS)* are also relevant.

The Development Plan

6.4. The development plan comprises the *West Sussex Joint Minerals Local Plan July 2018* (WSJMP), the *East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan February 2013* (ESWMP), and the *East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan February 2017* (ESSP). The district level plans comprise the *Adur Local Plan December 2017* (ALP) and the *Brighton and Hove City Plan Part One March 2016* (BHCP), and the saved policies from the *Brighton and Hove Adopted Local Plan 2005* (BHALP).

6.5. Shoreham Harbour itself is subject to a number of policy documents, some of which comprise supplementary planning guidance. For this site, these currently comprise the *Shoreham Harbour Development Brief: Western Harbour Arm 2013* (SHDB) and the *Shoreham Harbour Interim Planning Guidance 2011* (SHIPG). These documents are proposed to be replaced by the emerging *Shoreham Harbour Joint*

Area Action Plan submission document May 2018 (JAAP), which had its examination last autumn but is not yet adopted. The *Shoreham Harbour Flood Risk Management Guide SPD 2015*, *Shoreham Harbour Transport Strategy 2016* and the *Shoreham Port Masterplan Review 2017* are also relevant considerations although not all of these comprise planning policy.

Relevant planning issues

Need and economic issues

6.6. Paragraph 203 of the NPPF states that it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs, and that existing sites for the handling and processing of minerals should be safeguarded. Paragraph 205 states that when determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. Paragraph 80 of the NPPF states that planning decisions should help create the conditions in which businesses can invest, expand and adapt, and that significant weight should be placed on the need to support economic growth and productivity. Paragraphs 3.5.1-3.5.3 of the UKMPS notes the crucial contribution that marine aggregate makes to the nation's demand for construction aggregate, as well as the reduced amenity impacts that marine aggregates result in compared with land-won aggregate.

6.7. Policy WMP15 of the ESWMP states that capacity for landing, processing and handling and associated storage of minerals at wharves in Shoreham will be safeguarded. The supporting text recognises that sustaining imports of marine aggregates through local wharves is particularly important in the Plan because of the scarcity of land based mineral resources in this area. Policy SP9 of the ESSP also states that facilities at the port of Shoreham to land minerals and their consequential capacity are safeguarded. The site is identified as part of site SP-RSA/D within the Plan.

6.8. The *East Sussex, South Downs and Brighton and Hove Local Aggregate Assessment December 2018* (ESLAA) notes the heavy dependence on imports, including by sea,

in this area and the significant levels of marine imports received through Shoreham Port. Paragraphs 6.13, 6.16 and 6.17 of the ESLAA note that the principal constraint of marine landings is the security of port access (loss of wharves to other uses) and that it is essential that adequate safeguarding measures are in place, to protect this important supply of aggregate.

6.9. The WSMP also notes that marine-dredged aggregate is a major source of primary aggregate in this county. The Wharf is safeguarded under Policy M10 of the WSMP for the purposes of mineral transportation, as shown on Policies Map 2, which protects its long-term use and safeguards it from inappropriate redevelopment or surrounding development. The *West Sussex LAA January 2019* (WSLAA) also notes the significant contribution that marine-won aggregate contributes to overall aggregate supplies in West Sussex and neighbouring authorities.

6.10. Policy 8: *Shoreham Harbour Regeneration Area* of the ALP states that the Council will encourage developments that are consistent with the vision, strategic objectives and area priorities in the JAAP, and notes the area priorities for Character Area 5 within the JAAP, which include the safeguarding and developing of port operational areas.

6.11. Policy DA8: *Shoreham Harbour* of the BHCP states that developing North Quayside as a new and improved port operational area is a priority. Policy CP2: *Planning for Sustainable Economic Development* supports the sustainable economic growth within the city, supporting and retaining existing businesses and recognises the importance of employment-generating, non-B class uses to the local economy.

6.12. The SHDB and SHIPG both note that the aspirations to regenerate the area have to fit with the important contribution that the wharves make to supply of minerals in the area, and that capacity should not be lost.

6.13. The emerging JAAP notes that Shoreham Harbour is a key strategic location for growth, with the Council's working together to prioritise economic growth in this area. This site lies half within Character Area 3 (Quayside and South Portslade) and half in Character Area 5 (Southwick Waterfront and Fishersgate). Both CA3 and CA5

note that existing port facilities will be safeguarded and improved, and one of the aims of the document is to consolidate port operations in the eastern harbour arm, where this site is located.

6.14. Policy SH2: *Shoreham Port* of the emerging JAAP states that new development proposals within the port area will be assessed against the objectives of the Port Masterplan, which will be treated as a material consideration, and the areas safeguarded for port operational uses will be the focus for commercial port activity. It also notes that proposals for the upgrade, intensification and refurbishment of sites so they meet modern business standards and are more resource efficient will be supported. Policies CA3 and CA5 safeguards North Quayside for commercial port operations and related activities. The *Port Masterplan Review 2017* notes that the Eastern Arm and canal will become the focus for commercial port activity.

6.15. The development therefore is completely in accordance with the objectives of the above policy documents, the emerging JAAP and the overall vision for the Shoreham Harbour area. The importance of safeguarding the wharves, and their crucial contribution to the supply of minerals across West and East Sussex and Brighton and Hove is recognised throughout the policies and supplementary documents. In addition, this is a safeguarded site within the development plans, and the Eastern Harbour Arm, where this site is located, is designated as the focal area for future port operations. The upgrade and refurbishment of existing sites is clearly supported within the JAAP, and the proposal is also in line with the wider objectives of economic growth and job creation within the Shoreham Harbour area.

6.16. This proposal will enable the upgrade, modernisation and refurbishment of a safeguarded wharf, and improve efficiency and health and safety within the wharf area, by providing clear and separate accesses, parking and routes for lorries and cars, as well as more modern and therefore energy efficient buildings. It will also ensure the wharf is able to accommodate and receive aggregate from a more modern and efficient dredger, and as such ensures the economic viability and future security of the wharf, and the security of aggregate supply in the longer term.

Visual impacts

6.17. Paragraph 205 of the NPPF states that in considering proposals for minerals extraction, minerals planning authorities should ensure that there are no unacceptable adverse impacts on the natural and historic environment.

6.18. Policy M12: *Character* of the WSJMP states that proposals for minerals development will be permitted provided that they would not have an unacceptable impact on the character, distinctiveness, sense of place of different areas or the setting of various landscapes; on the separate identity of settlements and that they reflect and reinforce the distinctive attributes of main character areas. Policy M14: *Historic Environment* states that proposals for minerals development will be permitted provided that heritage assets and their settings are conserved.

6.19. Policy M23: *Design and Operation of Mineral Developments* states that proposals for mineral development will be permitted provided that the scale, form, layout and operations take into account the need to integrate with, and where possible, enhance adjoining land uses, minimising potential conflicts. They should also have regard to the local context including views in and out of the site, and include measures to maximise water and energy efficiency.

6.20. Policy WMP 23b: *Operation of Sites* of the ESWMP states that proposals for minerals processing and associated activities should include details of various features including (relevant to this application) plant and machinery, site roads, storage areas and vehicle cleaning.

6.21. Policy 15: *Quality of the Built Environment and Public Realm* of the Adur Local Plan 2017 states that development should respect and enhance the character of the site and prevailing character of the area. It should include safe access to the highway network and have acceptable parking arrangements.

6.22. Policy DA8: *Shoreham Harbour* of the BHCP states that an area priority is to improve connections and townscape along the A259. Policy CP12 *Urban Design* states that Shoreham Harbour is an area where there is potential for higher, denser

development and that all new development will be expected to raise the standard of design, establish a sense of place and ensure that the design of the external spaces is an integral element of the overall design approach. Policy CP8: *Sustainable Buildings* seeks to ensure that all new development incorporates sustainable design features.

6.23. Policy SH9: *Place Making and Design Quality* of the emerging JAAP states that schemes should improve the quality of public streets, should reflect the character of the marine environment, and should embrace principles of good urban design including clear distinction between public, private and semi-private space. Policy SH2: *Shoreham Port* states that proposals for the upgrade, intensification and refurbishment of sites so they meet modern business standards and are more resource efficient will be supported.

6.24. The most noticeable element of this site is the processing plant, which is not proposed to change as a result of this proposal. The proposed changes to the layout will not be significantly visible outside the site, other than along Basin Road North, given the topography of the land and the large embankment on the north side of Basin Road North. There are limited views of the site from the A259 where the top of the existing offices can be seen, just below the embankment. The existing office to be demolished does not contribute positively to the street scene, and its replacement with more modern buildings considered to result in a beneficial improvement in the appearance of the site.

6.25. Given the lower level of the site compared to the A259, the roof of the two-storey offices will still be lower than this road, as is the existing office. As such it will not result in any significant change along the street scene of the A259 and will be in keeping with the general industrial appearance of this site and those surrounding. Bringing the car parking spaces into the site, and the erection of a new fence and gates across the front of the site is also considered to result in a tidier and more modern appearance, as well as making clearer the distinction between public and private space. The remainder of the proposed changes are not likely to be visible outside the site.

6.26. The proposal will also result in improved energy efficiency given the upgrade of the buildings from the existing, much older building which was constructed at some time before the mid-1980s planning permission.

6.27. There is a Grade II listed public house, The Sussex Arms, approximately 100m to the north-west, however given the intervening road and other development it is not considered that the nature of the changes proposed will affect the setting of this building.

Amenity impacts

6.28. Policy M15: *Air and Soil* of the WSJMP states that proposals for mineral development will be permitted provided that there are no unacceptable impacts on the intrinsic quality of air, and no unacceptable impacts on AQMAs.

6.29. Policy WMP25: *General Amenity* of the ESWMP states that all proposals should ensure there is no unacceptable effect on the standard of amenity appropriate to the surrounding land uses, that there is no significant adverse impact on air quality or the acoustic environment, that there is adequate means of controlling noise, dust, odours, traffic and other development.

6.30. Policy 34: *Pollution and Contamination* of the ALP states that development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment, and that where appropriate, air quality assessments will be required in conjunction with development proposals.

6.31. Policy DA8: *Shoreham Harbour,* of the BHCP states that in North Quayside/South Portslade that new development proposals should take into account impacts on local air quality and that improvements and mitigation are sought where possible. Policy SH7: *Natural Environment, Biodiversity and Green Infrastructure* of the emerging JAAP states that proposals will be required to demonstrate that appropriate mitigation measures are introduced to ensure that residents are not exposed to poor air quality, and that noise should be controlled at source.

6.32. The site is adjacent to an Air Quality Management Area to the east. While there will be no increase in HGVs as a result of this proposal, given the proposed demolition and open storage of the aggregate (as existing situation) an Air Quality Assessment has been submitted to accompany the application. This has concluded that the site has been identified as low risk for dust soiling and negligible for health risk during the construction phase. The proposed mitigation measures for the construction phase are set out in Appendix A3 of the Assessment, and with these implemented, the residual effects are not considered to be significant.

6.33. The operational phase has the potential to cause dust emissions, but with the mitigation measures already in place as set out in Section 6 of the Air Quality Assessment, the resulting impacts are considered to be negligible. The site has been operating for many years without complaint and the proposed development, once in the operational phase, is not considered to cause any additional impacts from those existing.

6.34. The proposal will not give rise to any additional noise over and above that of the existing site. The only element that could generate noise is the hopper and conveyor, however the noise generated by these is limited, and there are already several conveyors on the site, closer to the north. The site is surrounded by other noise-generating businesses and in addition, the nearest sensitive receptors are approximately 100m to the north, with a main road and other industrial units in between. As such it is not considered that the proposal would give rise to any noticeable increase in noise at sensitive receptors.

6.35. The built development proposed by this application is not close enough to any sensitive receptors or other industrial/commercial units to result in adverse amenity impacts.

Flood Risk

6.36. Policy M19: *Flood Risk Management* of the WSJMP states that proposals for minerals development will be permitted provided that mitigation measures are provided to an appropriate standard so that there would not be an increased risk of

flooding on the site or elsewhere, for the life of the development; they are compatible with Shoreline Management Plans; appropriate measures are used to manage surface water run-off including SuDS where appropriate; and that they would not have an unacceptable impact on the integrity of sea, tidal or fluvial flood defences.

6.37. Policy WMP 28a: *Flood Risk* of the ESWMP states that development will only be permitted if it can be demonstrated that a proposal adequately provides for the implications of flood risk in that it would not increase the risk of flooding on the site or elsewhere; and is not detrimental to the integrity of sea, tide or fluvial flood defences; and has appropriate measures in place to reduce surface water run-off. Development in Flood zones must apply the sequential and exception tests where applicable and provide a site level Flood Risk Assessment.

6.38. Policy 36: *Flood Risk and Sustainable Drainage* of the ALP states that a site-specific flood risk assessment must be submitted for planning applications in Flood Zones 2 and 3. The FRA will need to demonstrate that development is appropriately flood resistant and resilient and includes safe access and escape routes, residual risk can be managed, will not increase flood risk elsewhere and will prioritise SuDS.

6.39. Policy DA8: *Shoreham Harbour* of the BHCP states that development should take into account the findings and recommendations of the current Flood Risk Assessment. Policy CP11: *Managing Flood Risk* of the BHCP states that planning applications in flood risk areas will need to demonstrate appropriate mitigation measures and site-specific flood risk assessments must be consistent with the latest guidance in the SFRA.

6.40. Policy SH6: *Flood Risk and Sustainable Drainage* of the emerging JAAP states that development proposals must comply with the principles and approach to flood risk management as set out in the Shoreham Harbour Flood Risk Management Guide 2015 or subsequent updated guidance.

6.41. The site lies in Flood Zones 2 and 3, and as such, a Flood Risk and Sustainable Drainage Assessment accompanies this application. The FRA has taken into

account the relevant guidance as set out above. It concludes that the site is at risk of tidal flooding, but proposed development is acceptable if the buildings have a finished floor level of 4.49m AOD and the buildings are additionally watertight for 300mm above this level. As a result, the applicant proposes to set the internal finished floor level at 4.79m AOD. It also recommends that the site manager signs up to the Environment Agency's Flood Warnings Direct service. The existing surface water drainage strategy is considered to be acceptable.

Access and parking

6.42. Paragraph 109 of the NPPF makes it clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

6.43. Policy M20: Transport of the WSJMP states that transport links should be adequate to serve the development and that there is safe and adequate means of access to the highway network and vehicle movements will not have an unacceptable impact on the safety of all road users, and that satisfactory provision is made for vehicle turning and parking. Policy WMP18 of the ESWMP states that minerals developments should seek to minimise transport movements and should demonstrate how access to the strategic highway network is suitable.

6.44. Policy 15: *Quality of the Built Environment and Public Realm* of the ALP states that development should have acceptable parking arrangements in terms of amount and layout. Policy 28: *Transport and Connectivity* states that appropriate level so car parking should be included taking into consideration the impact of development upon on-street parking.

6.45. Policy DA8: *Shoreham Harbour* of the BHCP seeks to improve connections around key linkages and secure improvements to legibility and connectivity. Policy CP9: *Sustainable Transport* seeks to improve sustainable methods of transport and direct development to accessible locations. Policy SH5: *Sustainable Transport* of the emerging JAAP seeks to minimise surface and on-street car parking. The Shoreham

Harbour Transport Strategy 2016 also state that new development should exacerbate existing issues with insufficient on-street parking.

6.46. The existing site has one access onto Basin Road North, which is not a public highway. The proposal provides for rearrangement of the car parking spaces, to be incorporated within the site, and to provide safer, separate accesses for lorries and cars. It will result in a slight increase in spaces overall, to relieve existing parking pressure and help prevent any amenity/highway safety parking issues. The new boundary and accesses do not encroach on the area of Basin Road North owned by the Port Authority, nor does it narrow the road given that this area is already used for parking. It does not involve any additional vehicles coming to and from the site or an intensification of the use.

7. CONCLUSION

7.1. The site is an existing aggregate wharf, which has been operating in this location for many years. The site is within the eastern area of Shoreham Harbour, which is proposed in local policy to be the area for focused and intensified port operations. This proposal seeks to make rearrangements to the layout of the existing wharf, to make it more modern and efficient, to improve safety and vehicle flow throughout the site, and so the site can accommodate receiving aggregate from a new dredger.

7.2. The application is accompanied by an Air Quality Assessment and a Flood Risk Assessment. It is not considered that the minor changes proposed by this application would give rise to any adverse impacts in terms of visual, amenity, flooding or transport. The significant importance of continuing aggregate supply via wharfs for the West and East Sussex areas is emphasised in the relevant policy documents, and this proposal will help to ensure the future economic viability of the site and continued aggregate supply. The proposal is considered to fully comply with the relevant policies in terms of need and amenity, and in terms of the future development policies for the Shoreham Harbour area.

7.3. It is considered therefore that there are significant benefits to allowing the development, and that the proposal will not result in any significant adverse impacts on the environment or amenity.