

# Shoreham Port Masterplan

## Consultation Report

October 2010

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# CONSULTATION REPORT

1 From the outset it has been acknowledged that consultation is an essential element of preparing a masterplan. A consultation strategy was agreed, which identified not only who would be consulted but why, in what format and when. Some initial consultations were to elicit background information, while subsequent consultations were to discuss emerging ideas and then to present the draft proposals to a wider public audience.

2 The consultees fall into three broad categories:

- Local authorities, MPs and public bodies
- Businesses located on the port area and land owners
- Local residents, community groups and the general public

A full list of organisations / businesses consulted is included in Appendix A of the masterplan report.

3 There has been a continuous dialogue with the local authorities – Adur District Council, Brighton & Hove City Council and West Sussex County Council. SPA attended an Adur Member Seminar in June and made a presentation on the emerging masterplan proposals. East Sussex County Council was also involved with regard to minerals and waste. The three local authorities (Adur DC, Brighton & Hove CC and West Sussex CC) reported to their respective Cabinets in September. Copies of their draft reports were made available and formed the basis of a meeting. This enabled some of the comments to be addressed by editing and expanding the text of the draft masterplan. Comments from the local authorities are presented below.

4 In general the three local authorities are supportive of the masterplan as it helps to secure the future prosperity of the port as well as the regeneration of the wider area. With regard to particular comments the main points were:

- While agreeing that non port operations should be resisted on South Quayside there are a number of existing uses in that area that could be difficult to relocate eg. waste uses;
- Wind turbines and solar panels, if carefully sited, could help to provide cleaner and greener energy. This would also accord with Eco Quarter principles for the wider regeneration and could attract green jobs into the area;
- The capacity of Southern Water's Waste Water Treatment Plant was a concern with regard to the wider regeneration opportunities and also the need to comply with new Marine Strategy Framework Directive;
- Support by Adur DC for a mix of housing and employment with a small element of commercial uses (cafes etc) preferred on sustainability grounds for the Aldrington Basin area, but recognises that all three options have merit, while Brighton & Hove City Council has a preference for Option 2 – Non Port Employment.
- Support for enhanced leisure facilities and improved public realm at Southwick Waterfront;
- Concern on the proposals for a new one way service road from Southwick Waterfront with regard to use by HGV's and general traffic as a rat-run to avoid congestion on the A259;
- Support for the work / proposals by SPA for the local amenity areas;

- While it is recognised that the Western Arm is the main regeneration opportunity and that certain port related activities would be relocated to other areas of the port, there is concern over the difficulty of relocating the non port related activities. The following statement is made *‘whilst accepting that the port will not be able to accommodate everything that needs to be relocated, some balance will need to be found if wider regeneration benefits are to be secured;*
- Concern over the visual impact of large areas remaining vacant within the port area in order to allow spare capacity;
- An implementation strategy will need to be developed, in close collaboration with the local authorities and land owners (tenants), to consider issues relating to business relocations, land assembly and infrastructure improvements;
- Enhancement of local amenity areas and public beaches supported but need to define how these are to be funded within the context of reducing public finance;
- Need to recognise changes in current regional policy particularly with regard to the revocation of the RSS and revision to the local authority core strategies;
- Concern over dredging once commercial shipping finishes in the Western Arm;
- Concern over implications of 25% growth in port trade on traffic generation and use of local roads (Southern Street, Manor Hall and Kingston Lane) rather than main network;
- Local junction improvements are likely to be required;
- Possibility of contra flow cycle lane on proposed Southwick Waterfront service road and dedicated lane on Basin Road South raised;
- Need to consider Air Quality Management Areas, especially at Brighton end of port;
- Proposals in the masterplan are in line with West Sussex Wharves and Railheads Study (2008)
- Need to mention issue of potential of contaminated land that may need to be addressed before residential / commercial development can take place;
- Need to mention Site of Nature Conservation Importance (SNCI) in Character Area 2 as well as the local authority LTP’s; and
- Potential for ‘Harbour Travel Plan’ should be considered.

5 A number of the above points, particularly with regard to traffic, new roads, amenity areas and dredging have been addressed in the revised masterplan. Also, SPA has responded to all three authorities with its comments on their Cabinet reports. While appreciating the general support for the masterplan proposals SPA has addressed the concerns / questions raised. (See [Appendix A](#)).

6 With regard to minerals, East Sussex County Council’s main concern is the protection of aggregate wharfs. The Minerals Local Plan supports the retention of facilities for receiving and processing marine imports. The Waste and Minerals Core Preferred Strategy develops this further and aims to safeguard the capacity of identified wharves unless alternative provision is made elsewhere within the port, such that there is no net loss of capacity. The County Council Officers have stated that they would be concerned if the masterplan proposals were to lead to a net loss of capacity for importing aggregates to serve the East Sussex and Brighton and Hove

markets. SPA has responded to East Sussex with its view with regard to the protection of aggregate berths.

7 With regard to the other public bodies the following have been consulted and the main views / comments are detailed below:

- Department of Transport – The Department of Transport state that it is pleased that the guidance published in 2008 has been followed. It considers that the objectives, strategy and potential proposals are clearly set out and *‘...hope that the masterplan will play an important role in establishing the future direction of the port’*.
- Environment Agency – The Sustainable Development Manager of the Environment Agency stated that *‘we (EA) welcome the opportunity to comment on the masterplan and to continue to work with the Port Authority on the regeneration of Shoreham Harbour as an exemplar site for sustainable development’*. The EA provided comments with regard to the policy framework, previously developed land, waste and resource management, water quality, water resources, biodiversity and recreation. With regard to flood risk a letter from the Assets Systems Manager stated *‘...am happy within its inclusion with the document. As stated in the Plan, the current flood mapping shows a risk to the port although this was completed some time ago’*. The EA’s response continues by stating that once the new mapping project is completed, it should give a clearer indication as to the risk within the port area. The EA has questioned the statement in paragraph 6.72 which states with regard to inundation from the sea at three locations – *‘would be of very short duration and not significantly impact’*. They are unable to verify this statement until the new mapping is available.
- Crown Estates – *has confirmed that they have no issues with regard to the masterplan proposals.*
- English Heritage – *‘...we would like to congratulate you on this (Draft Masterplan) and am delighted to note that the scheduled monument of Shoreham Fort gets several mentions as an important amenity area’*. Mention is made of the recent Section 24 grant, the Ports financial contribution and the role undertaken by the Old Shoreham Fort Friends Group. The comments conclude with the following statement. *‘We do appreciate the value Shoreham Port Authority attributes to this (the Fort) nationally important monument’*.
- Health and Safety Executive – The HSE has responded that its role in the land use planning process is to provide the local planning authority with independent and impartial advice on the safety of the public at certain new or modified developments near major accident hazard sites (Texaco Terminal, Calor Gas site, and ammonium nitrate warehouse). The HSE has expressed a willingness to discuss a range of issues – current hazardous substances consents, possible reviews or variations to consents, concentration of activities, revised methodology for assessing risks (ammonium nitrate) etc. Meetings will be arranged with the HSE, Adur District Council and SPA.
- Southern Water – Southern Water welcomed the opportunity to comment on the draft masterplan, particularly with regard to the existing waste water treatment plant. The existing plant capacity is limited and would need to be increased to meet the long term needs identified in development plans. Depending on the scale of development, not just within the port area, but wider area additional land would be required. In addition the new Marine Spatial Directive requires improvements to the treatment and discharge of effluents. Ideally the location should be adjacent to the existing works to minimise pumping flows between the sites, but this is not essential provided there is nothing that would prevent pipes being laid between the two. An ongoing dialogue is taking place between the local authorities, Southern Water and SPA.

- Littlehampton Harbour Board – Littlehampton Harbour Board (LHB) welcomes the strategy to maintain port uses at the same time as encouraging regeneration and economic growth. Specifically, LHB supports the proposals to maximise the availability of operational land and to expand provision for aggregates together with increased leisure berths. LHB values its relationship with SPA and considers the masterplan accords with LHB’s longer term aim to move to a leisure only harbour.

8 In addition, the following organisations were circulated with a copy of the masterplan leaflet and a link to the full set of reports and plans on SPA’s website.

- Royal National Lifeboat Institution
- Sussex Yacht Club
- Sea Cadet Corps
- RSPB
- GOSE
- Homes and Communities Agency
- Worthing and Adur Chamber of Commerce
- Nautical Training Corps
- Marine and Fisheries Agency (now the Marine Management Organisation)
- SEEDA
- Shoreham Sailing Club
- Sussex Friends of Sailability

9 Contact has been made with the major businesses operating on the port both port related and non-port related businesses. Some of the meetings were undertaken by SPA itself.

10 The meetings with the port located businesses discussed their current operations, firm and aspirational objectives for the future, the emerging proposals in the masterplan, local employment, business catchment areas and a discussion on general issues.

11 The main outputs from the meetings were:

- Businesses consider Shoreham Port as an ideal base for their longer term future growth- some would not consider an alternative site outside of the port to be suitable for their needs
- The local road network is not ideal for vehicle movements- particularly for larger HGVs
- Businesses which import materials by ship commented that on occasions there is a lack of shipping services which is a limitation to their operation
- Having sufficient storage space within the port is considered important to businesses, particularly where they do not have storage facilities of their own off the port - more cost effective to transport goods directly

- Some businesses would be prepared to invest jointly with Shoreham Port Authority to improve facilities at the port- this demonstrates their commitment to staying within the port.
- Businesses see the potential of the port to diversify into importing/exporting of other goods/materials
- Businesses are supportive of Shoreham remaining as a Trust Port
- Some businesses comment that there is a lack of additional wharves along the South coast to accommodate their needs
- Some businesses would be open to the idea of moving to another site within the port

12 With regard to wider public consultation, SPA held its Annual Public Meeting on Tuesday 13<sup>th</sup> July at Southwick Community Centre. The meeting was attended by over 60 people and the Chief Executive provided an overview and update of the masterplan within his presentation. The masterplan plans were displayed at the public meeting.

13 A manned public exhibition was held over four days.

Wednesday 14<sup>th</sup> July 10.00am to 5.00pm – Southwick Community Centre

Thursday 15<sup>th</sup> July 10.00am to 6.00pm – Holmbush Centre

Friday 16<sup>th</sup> July 10.00am to 6.00pm – Holmbush Centre

Saturday 17<sup>th</sup> July 10.00am to 3.00pm – Holmbush Centre

A total of 80 people attended at the Southwick Community Centre. The Holmbush Centre is a busy location, with a large Tesco's and Marks and Spencer, and several hundred people viewed the exhibition with many asking questions and providing comments on either the comment sheets provided or to staff at the exhibition. (These are summarised in paragraph 20).

14 Sunday the 18<sup>th</sup> July was the Port Open Day celebrating its 250<sup>th</sup> Anniversary. The open day attracted around 15,000 people and several hundred visited the main marquee where the masterplan exhibition was displayed. Again comment sheets were available and comments made to staff at the exhibition were recorded.

15 In order to publicise the exhibition, notification flyers were delivered to over 2000 homes and local businesses in the area. In addition, a leaflet was produced which detailed the purpose of the masterplan, the main issues to be addressed, the masterplan strategy and the draft proposals for each area of the Port. It also included details of the exhibition venues and times. The masterplan leaflet was circulated to all those on the Shoreham Port Authority mailing list (150 copies), plus copies were given to local libraries, local authorities and internally within the Port Authority.

16 In response to the exhibition – 100 completed comments sheets were returned, plus letters/emails and comments recorded by the staff attending the exhibition. These are summarised below.

17 The comment sheet identified eight priorities for the port and requested that people identified what the top three priorities should be. The priorities were:

- |   |     |
|---|-----|
| ▪ Protect amenities                     | 21% |
| ▪ Create local employment opportunities | 20% |

▪ Continue to grow as a port	19%
▪ Ensure footpaths and cycleways are protected	15%
▪ Develop a lower carbon port	9%
▪ Improve vehicular access within the port	8%
▪ Accommodate new housing	4%
▪ Other	4%
	100%

18 With regard to the other category the following comments were made:

- Greater emphasis on wind farms, solar, wave energy
- Reduce noise pollution
- Develop sailing marina
- Improve natural environment

19 With regard to the proposals for the different areas of the port the following support was recorded:

▪ Area 5 - Shoreham Fort and Kingston Beach Area	94%
▪ Area 4 - Southwick Waterfront redeveloped for leisure	91%
▪ Area 2b - Aldrington redeveloped for new employment (non-port related)	83%
▪ Area 2a - Aldrington redeveloped for new port activities	80%
▪ Area 3 - North Quayside developed as port operational area	78%
▪ Area 6 - Western Arm to be redeveloped for housing / commercial uses	71%
▪ Area 1 - Consolidation of port operators at South Quayside	69%
▪ Area 2c - Aldrington redeveloped for new housing and commercial uses	52%

20 A total of 25 respondents disagreed with the proposals – 15 were against the housing on Aldrington Basin (Area 2c), 9 against the development of the Western Arm (Area 6) and 6 against the development of North Quayside for port operational use.

21 The public showed a genuine interest in the port with the majority of the people engaging in a discussion on the role and future of the port. The most common concerns were:

- In relation to traffic generated by the port, particularly HGV's and the sub standard route (Church Road / Trafalgar Road) from and to the port from the A27/A23;
- While removal of the 'eyesores' in the Western Arm was welcomed there was concern over the traffic generation from new uses;

- The proposed on shore wind turbine in respect of visual impact and noise;
- The noise from certain operations, in particular Dudman Group's aggregates, and suggestions of a possible relocation to another site within the port;
- The limited capacity of the local waste water treatment works;
- Future public access to the waterfront if areas were developed for residential use (Aldrington Basin / Western Arm);
- That the port was not considering the potential of a ferry route; and
- Not enough consideration given to public slipways with appropriate car and trailer parking.

- 22 There was strong support for the port remaining an operational port with potential for some growth, recognising the employment and economic benefits of the port. A number of exhibition visitors were also pleased that proposals for large scale reclamation were not included and that the proposals for a large number of houses had been dropped. Support was expressed for the level of commitment given to the local amenity areas, the Fort, cycleways and the public facilities around Carats Cafe.
- 23 Comments were also made with regard to having new road bridges, directly from Church Road or Boundary Road, a new access opposite Gardner Road/The Gardens and a new pedestrian bridge to the west of the harbour entrance. A separate technical note has been prepared on Transport and Access.
- 24 The comments made have been reviewed and where appropriate the text of the masterplan has been amended or expanded to clarify the position.
- 25 The importance placed on consultations during the masterplanning process from the outset has meant that organisations and individuals concerns, ideas, opinions have been taken into account where possible and has resulted in a masterplan that has achieved a high level of support – both locally and from those with wider policy responsibilities.
- 26 The masterplan is not seen by SPA as an 'end document' but rather as a strategy that will evolve and change over time. Shoreham Port Authority intend to continue the dialogue with its tenants, businesses located on the port, the local authorities, government agencies and the local community as the proposals in the masterplan turn into actions on the ground.



Appendix A

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# Shoreham Port Authority Response to Local Authorities Comments



# Shoreham Port Masterplan – Shoreham Port Authority Response to Local Authorities Comments

## West Sussex County Council

WSSC: West Sussex County Council welcomes and broadly supports the masterplan. It provides a useful framework that sets out how the Port Authority sees the Port developing over the next 20-30 years. The masterplan is an integral part of the wider Shoreham Harbour Regeneration Project and the Council values the ongoing input of the Shoreham Port Authority into the wider partnership. It is important that this partnership continues, to ensure that regeneration opportunities for the Shoreham Harbour area are maximised.

### Economic Development/Regeneration

WSSC: In terms of economic development and regeneration, we support the principle of making best use of the land at the Port to ensure there is greater certainty for users, potential investors and wider stakeholders. In particular, the release of the western arm for new non port related development is supported given that the majority of land is in private ownership and the location of the area on the river and close to Shoreham town centre. There could be opportunities to secure mixed use development as part of the wider regeneration project for Shoreham Harbour, however, there may be difficulties in finding new sites for the port and other industrial uses to be relocated from the Western Arm and businesses that are required to relocate should be supported.

SPA: Relocation of some businesses is critical to safeguard jobs and allow regenerating to go ahead. Port related firms in the wrong place can be moved into the Eastern Arm. Some non-port related firms will be relocated locally such as on vacant sites within the nearby industrial areas and on sites in the port unsuitable for port use. A limited number of firms will be difficult to relocate due to their size or type of operation and sites further afield will have to be identified within the local authority plans to accommodate these businesses.

WSSC: The additional (direct and indirect) employment and economic benefits which could arise from port development associated with a potential of 25% growth in trade is supported, subject to ensuring that traffic and environmental impacts are minimised and carefully managed. In particular, the focus on renewable and low carbon businesses is welcomed, as this is seen as a key growth sector for the sub-region.

SPA: There will inevitably be some additional road traffic generated by the growth of the port, but some developments will not create any significant HGV traffic such as the proposed renewable energy plant. Also some new port uses will replace non-port uses such as haulage companies which will actually result in fewer lorries and therefore the net growth in road traffic is likely to be less overall than the 25% growth in cargoes.

WSSC: It is not clear from the masterplan, what the likely level of housing would be and this needs to be explored further as part of discussions about the wider Shoreham Harbour Regeneration Project. In particular, the options for Aldrington Basin area appear fairly fluid and will need to be defined more clearly.

SPA: The likely type, density and number of dwellings is really a matter for the local authorities to determine.

WSCC: In order to progress the business strategy and the masterplan, the SPA is intending to establish a joint venture property company to facilitate the sale and purchase of land and buildings. This is broadly welcomed, but should be explored within the context of wider discussions with the local authorities about the potential joint venture/special purpose vehicles. Further, an implementation strategy will need to be developed (in close collaboration with the local authorities and land owners/tenants) to consider issues relating to business relocations, land assembly and infrastructure improvements.

## Highways & Transport

WSCC: In order that we can assess the potential impact of the proposed growth in Port use, we would be grateful if you would quantify the predicted additional HGV and car trip generation that would result from the target of 25% growth in port trade to 2026. Movements of freight materials by ship or barge both after processing / handling as well as before are preferred where practicable in order to minimise additional HGV trips (e.g. Parker Steel).

Developments in the Harbour area that intensify transport demand would be subject to Transport Assessment but it should be noted that such development would be required to contribute to the Coastal Transport System scheme, which may include local enhancements to bus priority infrastructure in addition to the core scheme along with any other mitigation measures identified and required.

The concept of service roads to rationalise access to the A259 is welcomed where this can help to reduce HGV mileage on the A259 parallel to the port and channel HGVs to/from the most appropriate route to A270 & A27.

However, with regard to the new one-way access route along Southwick Waterfront that feeds through to the oil tankers, we are concerned as to the impact of encouraging HGV traffic to use this new entry point and access road. Further information is required on the trips likely to be generated here.

SPA: The new road at Southwick Waterfront is only to service an enlarged marina and is not intended as an access to the port uses further east. We will make sure the route is not used as a rat run by the use of traffic calming measures.

WSCC: Through representations to our County Local Committee and correspondence from the public, there is a local concern that HGVs and other unsuitable vehicles (from the Port and other Local Haulage companies) are using local roads rather than the main road network. Of particular concern is the use of Southwick Street, Manor Hall Road and Kingston Lane. On this basis, there is likely to some concern that this route in will encourage trips along Southwick Street.

SPA: Only about 6% of the traffic using the road network is HGVs and less than half of that figure is port related. The use of the roads above is restricted due to low rail bridges. The proposal to develop the marina at Southwick Waterfront is unlikely to increase HGV traffic.

WSCC: WSCC is keen to see a Lorry Routing Strategy developed to stop HGV and other unsuitable vehicles from using unsuitable local roads- keeping HGVs and large vehicles on the main road network.

SPA: There are already advisory lorry routes, which the vast majority of drivers stick too. SPA would be happy to participate in developing a strategy with the two highway authorities in liaison with local firms, but it is difficult to see what more can be done to significantly improve the situation other than the new access road now proposed in the masterplan and the junction schemes already underway.

WSCC: Improvements are likely to be required at the junctions of the access/service roads with the A259 at Albion St, Southwick and Church Road, Hove to accommodate rationalised access/internal routing so we are concerned that this is not acknowledged either on the plans or documents.

SPA: The current junction improvements have been designed in knowledge of the road and access proposals in the masterplan. Some minor adjustments to the layout and rephrasing of the signals will be needed, but these are expected to be fairly minor.

WSCC: The service road through Southwick Waterfront is proposed to be one-way; provision should be made for contra-flow cycling.

Development in the Western Arm and other areas fronting onto A259 should also consider improvements to cycle / pedestrian access along the A259 corridor in addition to safe & appropriate vehicular access junctions.

The masterplan acknowledges that National Cycle Network Route 2 (NCN2) is popular for journeys to work as well as for recreational use. The proposed improvement of the public right of way from Albion Street across the Lock Gates and crossing Basin Road is welcomed for both pedestrian and cycle utility and leisure use, including access from Southwick Railway station and bus services.

However, it is of concern that there is no mention of improvements to the NCN2 route along Basin Road through the South Quayside and Aldrington Basin areas to separate cycling from heavy port traffic and promote cycling to work.

SPA: This is already a very well used route by cyclists. SPA would welcome a safety audit by the highways authorities along this route to see if the route can be made safer. However, by far the greatest need for improvement is the route across the locks hence why this is particularly mentioned in the masterplan.

WSCC: The Local Emissions section should consider the Air Quality Management Areas neighbouring the Port in Shoreham High Street and B&H where it discusses emissions on the A259 near the port. Also there should be consideration of the impact on the AQMA on the A270 near upper Kingston Lane.

Increased trade and intensification of Port use are likely to have an impact on the amount of traffic that passes through these areas and as a consequence the Air Quality in these areas. Future traffic increases could lead to the AQMAs being extended if not mitigated.

SPA: Any new development in the JAAP area and beyond is likely to impact on the AQMAs. Other than stopping development altogether it is difficult to see how it can be prevented. SPA would welcome any suggestions on how the impact from port traffic can be mitigated.

WSCC: The current NO<sub>2</sub> figures from real time monitoring equipment and diffusion tubes in Shoreham High St show clear exceedances of the Govt & EU NO<sub>2</sub> human health objective pollution level. There is a requirement to reduce this by whatever means available. The current AQAP/LTP target to reduce traffic levels below the baseline 2006 fig of 21,500 vehicles per day in order to reduce NO<sub>2</sub> pollution below the government and EU human health objective figure of 40 U<sub>g</sub>/m<sup>3</sup> by the end of this year, or if not by 2015. Mitigation is needed now and will need to be intensified if further development increases traffic movements, especially HGV movements that have a disproportionate affect on emission levels.

Traffic data shows that there is existing current traffic congestion in the A259 area for example, the speeds observed confirm that traffic is already not free flowing at many times not just peak hours in the day.

In terms of Rights of Way, the County Council would like to explore whether there is any scope for improving public yacht and boat launch facilities. At present, Rights of Way has about 8 launching concrete ramps in the harbour under their responsibility, although only 2 are usable and we would welcome opportunities to discuss these further with the Port Authority.

[SPA: SPA continues to discuss the options for improving the launching of boats in the Adur River with the relevant bodies and interest groups. This will be highlighted more in the revised document.](#)

## Minerals & Waste

WSCC: We support the concentration of port operational land at Lock Gates/Dry Dock, North and South Quayside and the relocation of port-related activities from the Western Arm to other port operational areas provided that wharf capacity is maintained. This is consistent with findings in the West Sussex Wharves and Railheads Study (2008) which concluded that the wharves in the Western Arm of Shoreham Port should be afforded less priority status with regard to safeguarding.

Greater use of existing aggregate sites (para. 6.6 of the Masterplan) is also consistent with the Wharves and Railheads Study findings that there is potential for additional capacity at existing wharves within the port.

In terms of more specific comments/suggestions;

- Para 1.7 – Delete *'which is planned to be published in winter 2010'*.
- Table 2-8 – In the notes Kendalls are against 'Fishermans'. However in Table 2-5, Kendalls occupy 'New Wharf' and Monteum are in 'Fishermans'. Clarification is needed.
- Para 2.8 – no mention of LDF Wharf which is occupied by Tarmac for the importation of power station ash.
- Para 2.9 – no mention of Egypt Wharf and Railway Wharf East which are vacant wharves in the Western Arm.
- Para 2.13 – suggest that reference is also made to WSCC emerging policy options as set out in Background Paper 4: Transportation of Minerals and Waste, Version 2 (December 2009).
- Table 4-3 – we would query the figures for aggregates. The West Sussex Wharves and Railheads Study (2008) study shows that there was a greater throughput than shown in table 4-3 (average of 900,000 between 2002-2006). Would it be better to show tonnages over the past few years due to the effects of the recession?
- It is noted that it is proposed to relocate current port operational uses (Kendalls and Minelco) within the South Quayside and North Quayside. Further work may be required to determine whether this is deliverable as it is understood that there may be restrictive covenants on the land.
- Para. 6.42 – we have concerns about the potential for residential/business/leisure uses on the western arm if European Metal Recycling (EMR) cannot be relocated. The activities that take place at the EMR site would be incompatible with residential, leisure and some

business uses. A suitable alternative site would need to be found for EMR and although reference is made to relocating non-port operational uses (para. 5.2) no detail is given.

- It would be helpful to delineate wharves on a map as it is difficult to identify which wharves are referred to in the Masterplan and when comparing it with other documents. Confusion also arises as some sites have different names.
- Appendix B - Make reference to the Interim Planning Guidance for Shoreham Harbour produced by the JAAP team?
- Appendix B, West Sussex Minerals and Waste Policy – delete ‘which is planned to be published in winter 2010’.

SPA: The points raised about specific wharfs and the tonnage figures will be checked and any necessary changes made to the final version of the masterplan to ensure it is accurate.

The potential constraints to development raised in a couple of the bullet points highlight the complexity and level of difficulty there is in delivering regeneration in this area. SPA would expect the local authorities in their plans for the wider area to define possible sites off the port for the relocation of the non-port uses such as EMR.

A map of the wharfs will be added to the set of plans in the final version.

## Sustainability

WSCC: We welcome the proposals to include renewable energy within the masterplan, especially the use of PV cells on the Port buildings to reduce the need for external energy sources. It may be worth considering Biomass boilers or combined heat and power (CHP) sources too, as the port is well placed to receive the materials required to keep this contact, efficient power running effectively. There may also be opportunities to link any renewable power production with new (or existing) commercial and residential development.

The integration of residential development on the site would require careful management of access but may also open up opportunities for increased amenity along the beach front; much of which is underused at present.

The site is well placed to utilise sustainable transport links – especially rail - in any future developments, for either business travel or residential use. This may help alleviate some of the barriers due to the current access provisions. We support the continued development of the site as employment provision for the local workforce.

The development of the masterplan is also an opportunity to ensure the port buildings both leased and used directly by the port have high standards of energy efficiency (voltage optimisation, insulation, solar gain, passive ventilation etc) – which will reduce carbon emissions and reduce fuel costs.

Future consideration in the development of the plans should be made to the issue of contaminated land; especially in areas used for residential development.

It is noted that there are already other studies underway to look at the provision of flood risk management at the port and any future developments on or around the site. These should take into account the amenity value of the beach, and wider environmental benefits which can be integrated into flood risk management schemes. Although each scheme would be assessed on its merits, a wider integrated assessment of the flood risk around the port and the other affected

areas is welcomed as it may allow innovative and cross functioning solutions to be found. We look forward to seeing the outputs of this study.

Further, we would like to see the inclusion of green infrastructure (green roofs, tree planting, open space etc) to improve the landscape, benefit air quality and noise and provide links through the port for wildlife as well as other benefits such as reducing summer heat through shading, reducing rainfall run-off and drainage issues and providing amenity for workers and the public alike.

SPA: The principle of promoting green infrastructure is accepted and will be added to the masterplan. SPA would welcome detailed proposals for the port from the local authorities on the list of ideas mentioned above.

## Environment & Heritage

WSCC: The character area within the masterplan is considered to be very useful. The majority of natural and historic environment designations are referred to, but we could not see reference to the Site of Nature Conservation Interest (SNCI) which affects Character Area 7 (Harbour Mouth/Outer Lay-by Area).

SPA: The SNCI will be added to the appropriate map.

WSCC: In terms of detail, we believe that p.30 para. 6.37 should also refer to the Old Fort.

The only other comment is whether it would be worth considering the views towards the historic town from the identified amenity areas and ensuring continued visibility.

## Policy

WSCC: The Draft Masterplan seems to reflect our established policy approach to maintaining port uses whilst restructuring land uses in the Port to the wider benefit of the Port and the local communities. This includes a clear statement of appropriate objectives.

It acknowledges the relevant plans that apply to the Port (in the section headed Link to Other Plans), although the wording should be tidied up. The reference to the local authorities should read "Brighton and Hove City Council and Adur District Council who are responsible for preparing the Local Development Plans, and West Sussex County Council which is responsible for preparing the Minerals and Waste Development Framework and the Local Transport Plan."

## Conclusions

WSCC: In summary, West Sussex County Council welcomes and broadly supports the masterplan and recognises it as an important stepping stone in the wider Shoreham Harbour Regeneration project.

I have highlighted a number of areas where we wish to see further work carried out and areas clarification is required. We have confidence that these matters will be addressed going forward.

The County Council welcomes the good relationship it has with the Port Authority and wishes to continue to work closely with the Authority and other partners, to ensure the opportunities for regeneration are maximised.

## Adur District Council

ADC: The draft masterplan is to be welcomed since it provides a clear spatial strategy for ensuring the prosperity of the port and the wider regeneration of the area. It is a key building block in taking forward the wider Shoreham Harbour regeneration project and securing real benefits for the local communities in Brighton and Hove and Adur.

A joint Area Action Plan is being produced by Adur District Council, Brighton and Hove City Council and West Sussex County Council in partnership with key stakeholders to produce a statutory planning framework for the regeneration of the Port and surrounding area. This plan will put forward options for the development of new homes and jobs as part of an exemplar sustainable development under the Government's growth and eco town programme. Whilst the boundary of the JAAP area remains to be defined, it's focus is on the Port. The masterplan will be a key part of the JAAP and incorporated in the options to take forward for community involvement.

Planning officers from the 3 local authorities have inputted into the draft masterplan to ensure that the areas of potential incompatibility are minimised. However, not all the studies being undertaken to inform the JAAP are completed and in particular the flood risk and transport studies will be vital in determining the viability and delivery of development. A capacity study is also underway to determine the right levels of development for the area. Whilst some aspects of the Masterplan can be implemented ahead of the JAAP process (as long as they accord with the overall vision and strategy of the JAAP), other elements will be steered by the JAAP and come forward after the public hearing and adoption of the plan.

The release of the western arm for new non port related development is supported given that the majority of land is in private ownership and the location of the area on the river and close to Shoreham town centre. There could be major opportunities to secure mixed use development as part of the wider regeneration project for Shoreham Harbour. However, as detailed later there will be difficulties in finding new sites for the port and other industrial uses to be relocated from the Western Arm.

[SPA: See later comments on relocation.](#)

ADC: As detailed later, there is a concern about the proposal for a new service road and new access road along Southwick Waterfront and North Quayside because of its potential to be used as a rat run (when congestion occurs on the A259) and as a through route for general traffic. It would also have a detrimental impact on the conservation area and could impact on the users of the Southwick sailing club. However the general principle of improving access for port traffic (through creating an easier and continuous link to the main Church road junction long the northern side of the Canal) and diverting this from the A259 is supported.

[SPA: The new road at Lady Bee is only to service an enlarged marina and is not intended as an access to the port uses further east. We will make sure the route is not used as a rat run through the use of traffic calming measures.](#)

ADC: The master plan makes reference to a number of policy documents which needs to be updated to reflect current circumstances for example the revocation of the Regional Spatial Strategy for the South East. The Core Strategies for Adur and Brighton and Hove are being revised to take into account the revocation.

[The references to planning documents will be updated.](#)

ADC: The Government's new localism agenda with its emphasis on community engagement and for local communities to determine how places develop needs to be taken into account in the Master Plan and the way that this is taken forward. This agenda will be a significant impact on the way the growth point and eco quarter strategies for Shoreham Harbour develop.

SPA: There has been considerable community engagement in the development of the masterplan. The masterplan will be reviewed on a regular basis involving further stakeholder consultation.

ADC: The additional employment and economic benefits which could arise from processing/manufacturing activities is supported as long as traffic and environmental impacts are minimised and carefully managed.

SPA: Any proposed development on the port involving processing and/or manufacturing will require planning permission and transport/environmental issues will be considered under this process.

ADC: Whilst it is understood that there is a need to allow spare capacity at the port to take up new opportunities when they occur, it is unclear what this would mean in reality – ie the amount of land that would be kept empty and for how long. There would be concerns about large amounts of land deliberately kept empty given the important need to relocate industry from other areas of the port. There would also be a visual impact.

SPA: The sentence in the final masterplan document will be amended and the words "spare capacity" removed.

ADC: Measures to address climate change are welcome and there would be economic and employment benefits from accommodating services for the off shore wind farm. Some on shore wind turbines would also be supported as long as these are suitably located in relation to port and other uses.

## South Quayside

ADC: South Quayside – agree that non port operations to be resisted. However, existing non port uses e.g. waste uses may be difficult to locate if not elsewhere in the Port and could make use of ship transport for imports and exports. Welcome proposed green port initiatives. Wind turbines and solar panels if carefully sited could help to provide cleaner and greener energy not only for the port but the wider community and this has to be welcomed. This would also accord with the Eco Quarter principles for the wider regeneration project and could also attract green jobs into the area.

The waste water treatment facility on South Quayside (adjacent to the power station) which serves an area covering Shoreham, Southwick, Portslade and parts of Hove, currently has limited capacity to accommodate future new housing development in this area. Discussions are taking place with Southern Water to address this issue and the possibility of expanding the existing facility. It is understood that the Port Authority is in discussions with a company to develop a renewable energy facility to the east of the power station. Whilst such a use is supported, a more pressing requirement is the need to ensure sufficient waste water treatment in the future. Both facilities need to be looked at together in on-going discussions for use of land in this location. The wider port area should also be looked at in relation to the possible provision of a new treatment works.

SPA: A meeting is arranged with Southern Water to discuss their requirements. If after the meeting a clear need for a site is established then the JAAP should identify the site after

considering the options. This should not prejudice the development of the renewable energy plant, which is now at an advanced stage and the planning application is imminent.

## Aldrington Basin options and new road

ADC: All 3 options have some merit but a mix of housing and employment with a small element of commercial uses (cafes etc) preferred as part of creating a sustainable community/eco quarter. There is already existing and proposed housing as well as Hove Enterprise adjacent to this part of the Port.

Whilst a new road will provide better access for port HGV traffic and divert traffic from parts of the A259, there could be an impact for the housing option unless carefully designed.

## Southwick Waterfront

ADC: The proposals for enhanced leisure facilities and small business units for this area together with an improved public realm are supported since they will bring regeneration benefits to the area and will also complement and enhance the Conservation Area.

There is a concern about providing a new one way (west to east) service road if this is to link to the new two way access road since this could attract use by general traffic impacting on the Conservation Area and land uses in this area including the Southwick sailing club. It could also lead to rat-running at times when the A259 is congested. Although the access junction with the A259 is narrow and unlikely to attract use of this road by HGVs and other commercial traffic to access the port eastwards, reassurance is needed on this. A new service road could be supported if this was to serve the marina and leisure area only but not a road that has a wider access potential. A service road which is two way to allow a turn around should be considered.

SPA: See earlier response. The two way option would actually increase the traffic passing the conservation area.

## Harbour Mouth/Outer Lay-by

ADC: The work of the SPA to improve local amenity areas is welcomed. It is acknowledged that in order for a slipway to be used effectively that car parking and safe access is needed and this cannot easily be provided on Kingston Beach with its village green status.

## Western Arm/River Adur District Council

ADC: This area is the main opportunity within the Port area to secure new development to meet wider regeneration aims for Shoreham Harbour. The river environment has potential to be a good location for mixed sustainable development and is close to Shoreham town centre. However it is a challenging area to develop and as stated in the masterplan, parts of the area are long term in terms of development phasing. A major issue is that of the relocation of industrial uses. As stated earlier, whilst the masterplan refers to the relocation of port uses to the Canal area, other non port uses may be difficult to find new homes for. Some uses whilst not port related may still find a port location attractive if there are already industrial activities here. Whilst accepting that the port will not be able to accommodate everything that needs to be relocated, some balance will need to be found if wider regeneration benefits are to be secured. On-going work (as part of preparing the joint Area Action Plan for the harbour) on land capacity and relocation will provide more information on this issues.

SPA: Relocation is critical to safeguarding jobs while regenerating the area. Port related firms in the wrong place can be relocated into the Eastern Arm. Some non-port related firms will be relocated locally such as on vacant sites within the nearby industrial areas and on sites in the

port unsuitable for port use. A limited number of firms will be difficult to relocate due to their size or type of operation and sites further afield will have to be identified within the local authority plans to accommodate these businesses.

ADC: Short leases for temp uses urged on vacant port land so as not to prejudice wider plan.

SPA: There are several sites where we now only offer short leases or annual licences to prospective tenants to keep the option open to redevelop the sites. Where existing tenants have a long lease SPA is negotiating shorter leases when the opportunity arises.

ADC: Once commercial shipping finishes in the Western Arm and the Port no longer takes responsibility for dredging the river, there is a concern that this may make the river unusable for other river craft. Reassurance is needed that there would be no impact.

SPA: The Western Arm will remain within the harbour limits and SPA will continue to manage and maintain it to a standard suitable for leisure craft.

ADC: The enhancement proposals for the public beaches are supported although it is not yet defined how these could be taken forward and how these are to be funded. Partnership working with Adur Council is acknowledged but needs to be seen within a context of reducing public finance.

SPA: The masterplan covers the next 20 years and clearly not all the proposals will be implemented in the short term for practical and financial reasons. Hopefully, public funding and/or sponsorship will become available at sometime to carry out most if not all of the proposed improvements within the life of the plan.

ADC: With regard to noise impact whilst it is accepted that noise will reduce on the western arm with the relocation of port related uses, there remain some non port related uses throughout the area which generate some noise which will need to be addressed within the joint Area Action Plan. HGV and other commercial traffic also generates noise and needs to be addressed particularly where close to residential areas.

## Brighton & Hove City Council

BHCC: The City Council welcomes the Masterplan's identification of future growth in trade at the port. The City Council considers that employment growth should be the aim of future developments in the Port. The City Council considers these plans should include non port operational employment uses. The City Council recognises that the precise balance between port and non-port uses should be a commercial matter between the Port Authority and private land owners.

The City Council requests clarification in broad terms as to whether predicted Port growth can be accommodated on existing wharves/land, whether it requires the relocation of existing employment uses not related to port operational uses or whether there is a potential surplus of land since the draft Masterplan refers to all three situations.

The City Council is concerned at the suggestion of the relocation of existing non-port operational uses at the Port. It is not clear if the proposed relocation would be within the Port or elsewhere. The City Council would be concerned at the loss of these uses from the local area both in terms of local employment and as these uses perform important functions for the City, including those located in Adur District. Previous work initiated by SEEDA has highlighted the difficulty of finding alternative sites for these uses in Brighton & Hove and Adur.

SPA: The relocation of non-port uses especially on the southside is needed over time to allow the port to grow. There will always be a natural turnover of tenants. We will just simply not lease the premises as they become available to non-port uses in the future. Also the current leases in the areas identified for major change allow us to take back the sites in a relatively short period of time and the firms know they would have to find new premises if this happens (at their cost). In most cases the firms such as the haulage and engineering firms could relocate to other vacant premises in the local area. I accept some firms will be harder to relocate because of the nature of their business.

## Aldrington Basin

BHCC: The City Council's preferred option for Aldrington Basin is option 2 - non-port employment. Incremental development and environmental improvements could develop on the situation in this area already. The City Council could support some residential development as part of employment led mixed-use development subject to there being no direct loss of employment floorspace or indirectly through prejudicing employment activities on adjacent sites. However, the City Council notes that with the Masterplan's proposed changes in access arrangements the available sites would be surrounded on three sides by the main route into the port for heavy goods vehicles. The City Council also considers that this area is likely to be difficult to develop for residential use for technical reasons such as the size and shape of potential development sites. The outcome of the Development Capacity Study being undertaken for the overall harbour area should provide more information on development potential in this area.

## North Quayside

BHCC: Clarification is required as to how port operational use could be implemented in this area since not all the land is owned by Shoreham Port Authority. Clarification is also required as to what port uses could be relocated or established in this area and the environmental impact of those uses. The Masterplan states that the environmental impact of the Port currently in this area is acceptable. Evidence of this assessment would be helpful.

## South Quayside

BHCC: The City Council agrees that port related uses should be the priority in this area (which extends into Adur District). However, the existing Waste Water Treatment Works (in Adur District) serves the west of the City. Southern Water has indicated that expansion of the works would be required to meet future housing development. The Masterplan also indicates that renewable energy facilities could be located in this area which is strongly supported by the City Council but is not necessarily port related. There is also concern about the feasibility and desirability of relocating non port related uses from this area.

## Environmental Impact

BHCC: The draft Masterplan states that in 2009 the Port undertook an environmental audit under the Eco Ports Initiative, and is working towards gaining a certificate under the Port Environmental Review system, which can lead to accreditation under ISO140001. The City Council would strongly support the Port Authority in achieving the sustainable development of port operations. The City Council would also strongly support the Port in its discussions to become a possible base for servicing the proposed off-shore wind farm.

SPA: As regards making a positive contribution to the environment and amenity we very much want to work with B&H and others on drawing up strategies and programmes on climate change and environmental improvements making the most of external funding such as INTERREG

Funding. We have already suggested some ideas to be included in the bid for EU money. We have been successful in being awarded both EU and EH grants recently and see no reason why this won't continue. New and improved amenities will be incorporated into major development schemes as and when they happen. Private sponsorship is another area to explore. I am confident that the proposals in the masterplan can and will take place but obviously not all in the first few years. This can't be solely a SPA role. It will need the local authorities and the Environment Agency to get actively involved and in some cases take the lead.

## Minerals and Waste

BHCC: Current planning policy in Brighton & Hove (and West Sussex) is that certain specified wharves within Shoreham Port should be safeguarded to allow the import of minerals (sand and gravel dredged off shore).

The City Council notes that some of the wharfs within the Brighton & Hove part of the Harbour are potentially unviable for importing minerals. The City Council is keen to reach agreement with the Port Authority (and West Sussex County Council) as to how facilities for aggregates imports through the Port can be provided whilst allowing the Port to grow. The City Council is disappointed that the Masterplan does not refer to the fact that the City Council has been in discussions with the Port Authority over this issue. Should those mineral wharves be released from safeguarding then the City Council would be keen to see alternative employment uses on the sites as part of the economic regeneration of the area.

It is understood that the existing non-port operational uses include handling waste materials and recycling, which are important in supporting further growth and construction in the City. Similarly, there are waste uses in the western arm of the Port which serve the City. The Council is keen that the future of such uses is not prejudiced by the development of incompatible adjoining uses. These uses may not be port related currently, but could become so in the future, e.g. export of recycled materials by sea.

## Transport

BHCC: There are two key issues at this stage in the Masterplan's development. These are the likely change in, and subsequent effects of, traffic levels and movements resulting from the proposals, and proposed changes or improvements to vehicle/person access into the Port area.

While focusing on the need for large vehicles to access the Port, the Masterplan fully recognises the benefits that the proposed bus-based Coastal Transport System will provide for people accessing the Port, as well as the need to maintain and improve good pedestrian and cycling access between the coastline, Port and local communities, as well as access/movement within it.

The commentary/assessment and proposals for the three main access points into the Port from the A259 at Wharf Road, Station/Boundary Road and Church Road are considered acceptable in principle. Plans to rationalise junctions and access are welcomed, in terms of reducing turning movements and delays to traffic on the A259 but must also take into consideration any possible effects on access into the port for all road users. The proposed new access road/link within the Port will also have potential benefits in terms of reducing the number of vehicles on the adjacent section of the A259 and is supported. Further consideration will need to be given to the effects of large vehicles on the local community, particularly the main A293 (Church Road) connection to the A270 and A27. The location of the Harbour within the city's Air Quality Management Area also needs to be recognised and every effort should be made to ensure that levels of emissions from any port-related activity are minimised, including vehicle movements to and from it.

Although not recognised in the Masterplan, the Port's proposals provide an excellent opportunity to discuss and set up an area/Harbour Travel Plan that could help manage and minimise the effect of increased trade and activity in the Port and deliver wider benefits to existing Port users and future occupants.

## Phasing and Delivery

BHCC: It is understood from the consultants producing the draft Masterplan that the joint venture property company is not the same as the investigations into a special purpose vehicle instigated with the three local authorities and clarification is requested as to the Port Authority's view on this latter proposal.

SPA: The joint property company has come out of the work on reviewing our structure, which we had to do for the DfT. We put forward a set of proposals to make us more commercial to partly fend off the threat of privatisation. We are now expected to take the idea forward after Mike Penning MP - Parliamentary Under Secretary of State - confirmed his acceptance to our proposals. At this stage we have not looked at it in any detail. The main point of the company is to find a private partner who will invest in the port area over the long term. We will be looking at the various models soon and will happily brief partners on a regular basis. It shouldn't clash with the SPV idea, but we will have to be careful about how both companies are set up so they work with each other and not against. We will probably want to get on with our property company sooner than the SPV will happen. We may even look at moving forward as early as next year by starting with one scheme initially before properly setting up a more permanent legal structure later on.