



## Western Harbour Arm – Delivering A Corporate Priority

The review of Western Harbour Arm (WHA) requests a place-based review of what has been delivered and what could be delivered in the future to complete the delivery of the allocation to achieve a high quality outcome. Considerable progress has been made, the number of new units approved already coming close to the minimum 1100 units described in the Adur Local Plan (and Joint Area Action Plan). It is clear that demand, in itself is not the issue.

Since 2017, when the Adur Local Plan was adopted, there has been a clear and consistent planning policy framework in place. This was further supported by the Joint Area Action Plan (JAAP) which detailed area specific policies for this key regeneration area. Again, given the levels of existing new units delivered/approved, the planning policy position does not appear to be preventing or putting off delivery.

Having reviewed the process of delivery at WHA, it is clear that there is a gap between the delivery of policy and the determination of applications, where active, positive promotion of Western Harbour Arm as a single coherent new area and community is not happening. The issue, I believe, is that whilst Adur District Council officers have produced well executed policy documents (both the Adur Local Plan and the Joint Area Action Plan). Once adopted, these Corporate Policy Documents have not been actively promoted by the Council as a whole. Coordinated, active promotion of the allocation as a whole, would benefit the delivery of high-quality development on site, the provision of infrastructure and coordination of public open space. This approach has been taken in neighbouring Worthing Borough and is delivering results on a number of high-profile sites across the Town Centre.

The delivery of 1100 new homes at Western Harbour Arm is a high profile, largescale project for Adur District and as such, requires a strong, long-term and coordinated approach to promoting its development. There has been a significant change in the approach to how largescale regeneration is approached and promoted in Worthing and this would be a useful model to adopt in Adur. By increasing the breadth of teams or service areas that are engaged in site promotion and the place-making agenda at WHA, it will inevitably increase the resource and therefore capacity to pursue a more coordinated and desirable outcome at this significant allocation. It will require focussed leadership to ensure communications, resource and effort is aligned across these teams/service areas.

The communications released about Western Harbour Arm are focussed on individual applications or sites. Much of this relates to the increasingly controversial applications that are being refused at planning committee. At this time, with consideration of the overall development, there is an opportunity to re-set the communications for the Western Harbour Arm in a more positive way, re-establishing the wider aims and vision for the regeneration of the Port/Harbour. Reminding the public about why the regeneration is happening, that WHA is only a part of it and that it supports the wider economic sustainability of the area would be positive and change the approach from only being spoken about when it is about an individual, and increasingly controversial, application, to the wider Port/Harbour and the overall – long-term – vision for the area.

If wider corporate support is not possible or available, the limited resources of the Planning Policy team should be focussed on the required review of the local plan. As well as placing additional pressure on a small team, the preparation of a further document that is not promoted and supported by the wider teams may well do reputational damage to the Council.

### **Key Recommendations**

- ☐ Corporate ownership and oversight of this high profile and long-term programme of regeneration. Clear strategic vision and narrative articulated and understood across the council and an in depth understanding of “what success looks like” at WHA by all teams with specific engagement and involvement in delivery of the programme.
- ☐ Ensuring that those leading delivery maintain a strategic view of development at WHA. There must be constant review/checking of the cumulative impact of proposals on the allocation as a whole; place-making and coherence of “place” and, coordination of infrastructure provision including green infrastructure.
- ☐ A clear understanding and communication the vision and aims of the regeneration of WHA. This must be clearly understood within the Council to ensure the messaging externally is clear and consistent. The purpose/justification as well as the benefits and progress towards the vision will need to be regularly (and consistently) communicated.

## Planning Considerations for Delivery of Western Harbour Arm

The Adur Local Plan is currently under review. It is therefore appropriate to consider what, if any changes to the local planning framework could be to address concerns within the community and Council regarding the scale of development and the timing of infrastructure provision, in a timely manner.

### Key Drivers

#### ● Timing/Influence

- The Western Harbour Arm is allocated for housing
- The situation is “live” with development on the ground and applications being submitted “in real time”
- For actions taken by the Council to influence future development, there needs to be a rapid response

#### ● Material Weight

- Perception that existing community not being listened to and burdened with high levels of development and the lagging infrastructure provision
- How can these concerns be given greater weight, such that developments must respond/take into account these concerns
- Impact/ability to influence is greater at the earlier stages of design/development

### Critical Timing

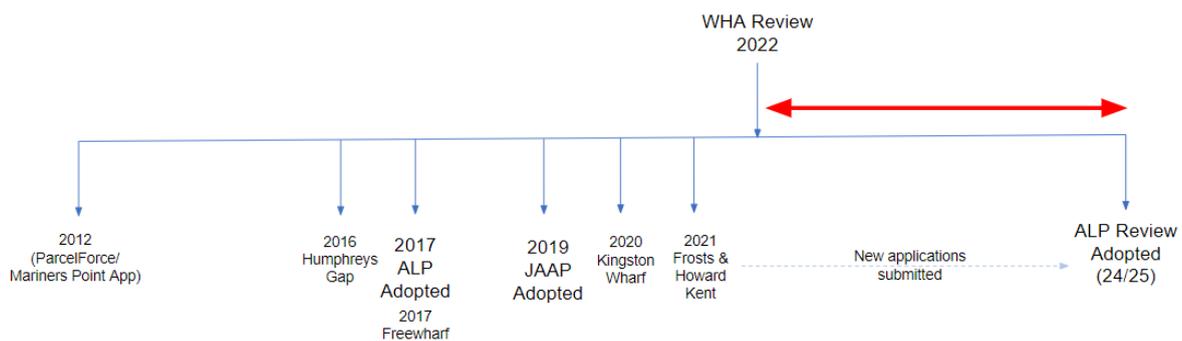


Fig. 1: Timeline of Policy adoption and planning application determination at Western Harbour Arm.

## Planning Options Considered

Option	Process/Issues	Timing & Weight
<b>Do Minimum</b>	Continue to pursue changes to applications in pre-app and post submission	Short & Low
<b>Policy Position Statement</b>	Provide guide of existing policy tools	Short & Medium
<b>Collaborative Agreement</b>	Jointly prepared and agreed “statement of intent”, developed in collaboration	Medium & Medium
<b>Development briefs masterplan</b>	Site specific briefs for future development	Long & High
<b>WHA Design Code</b>	Policy Development, led by ADC, requires engagement/consultation	Long & High
<b>Supplementary Planning Document</b>	Policy Development, led by ADC, requires engagement/consultation	Long & High
<b>Amend Existing Policies</b>	Policy Development, led by ADC, requires examination/adoption	Long & High
<b>Neighbourhood Plan</b>	Policy Development, led by forum/parish, requires examination/adoption	Long & High

Table 1: Planning Options considered

**Do Minimum (Maintain current protocol)** – Continue to pursue changes to applications in pre-app and post submission. This relies on existing resource and requires minimal changes (may not be considered a “response” by the community). This would technically be “immediate with regards to timing, in terms of weight it would continue at the current level (low in terms of change/increasing weight).

**Policy Position Statement** – Since adoption of the Adur Local Plan (2017) and the Joint Area Action Plan (2019) there have been and continue to be significant changes to the planning system in England. Changes to the National Planning Policy Framework are currently being consulted on which could significantly change the planning policy requirements. This option therefore constitutes a two-part approach. Firstly, to assist in familiarising new members of the Adur Planning Committee with existing policy. Secondly, to review existing adopted policy against new (current) national policy and guidance and establish compliance. (Short term timescale and high material weight as, if local adopted policy superseded, would likely revert to National Policy which carries high material weight).

**Collaborative Agreement (Delivery Statement)** – If the Council requires developers (or landowners) to deliver more in addition to local adopted policy (or due to changes in National Policy) then they could work with developers (and landowners) to pursue these different/higher requirements. In order to increase the weight of these discussions, a statement of intent (MOU, SoCG) could be agreed which sets out the intentions of all parties on what they will deliver. (This would take time and consistency and clarity of message so likely medium term, with medium weight).

**Development Brief/Masterplan** – There is an existing Western Harbour Arm Development Brief (Allies and Morrison Urban Practitioners, July 2013) The brief has been informed by a large body of technical background work, public consultation and engagement and has been subject to Sustainability Appraisal.

**Western Harbour Arm Design Code** – The draft revisions to the National Planning Policy Framework strongly advocate for area wide design codes. Whilst this will take a considerable amount of time to prepare, it seems unavoidable that a Design Code should be prepared for Western Harbour Arm, as a minimum. It may be beneficial to include the areas immediately surrounding WHA. Beyond that the character of the areas changes significantly and there should be consideration of the need for separate design codes for other specific character areas.

**Supplementary Planning Document** – A Supplementary Planning Document should flow from and build on policies in the primary policy document. An SPD would therefore need to be developed subsequent to the Adur Local Plan (review) document.

**Amend Existing Policies** – This is listed as it is an option. This process is already underway. The Adur Local Plan is reviewing the status of all policies in the adopted plan. It will amend or update any policies as required.

**Neighbourhood Plan** – This is an option within the sphere of planning. The allocation of this major development is right to be dealt with in the Adur Local Plan. The Joint Area Action Plan provides focussed and detailed policies covering all areas of development. There is no local forum or parish in this area.

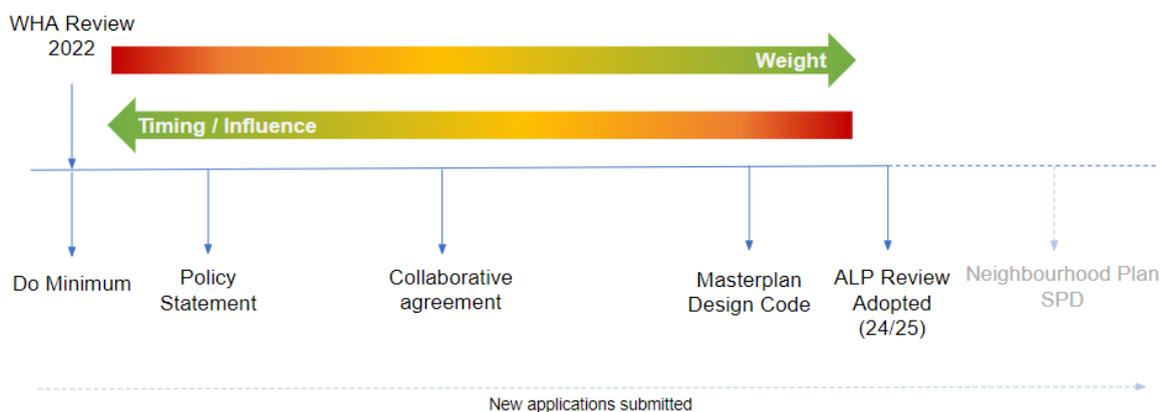


Fig.2: Showing Planning Options against both Key Drivers.

## Recommended Actions / Next Steps

Theme	Issue	Recommendation
<b>Set and articulate/ promote long-term Vision</b>	The Council has created and adopted a Vision for the regeneration of Shoreham Port and WHA as part of that.	As it is a long-term project/ programme, this will need to be repeated regularly to ensure that the vision is understood by all.  It is a long-term goal and needs to be clearly articulated to all relevant people/ teams both inside and outside of the Council.
<b>Corporate Ownership</b>	Limited engagement from wider corporate body.  Overreliance on Planning function to deliver new community	Engagement of additional teams with the promotion and placemaking agenda of WHA
<b>Positive Long-term promotion</b>	Information going out about WHA is focussed on individual applications which are increasingly controversial.	Develop an in-house communications strategy which provides key information such as headline statements about the Vision and aims of regeneration at WHA, key achievements, delivery to date.  Provide similar key information to partners / work with partners to develop key wording for their own communications where they relate to WHA
<b>Co-ordination of Allocated Area</b>	Whilst the time has past for consolidation of land ownership and financially it is not viable. There needs to be coordination and bringing together of landowners/ developers/ infrastructure providers/ decision makers in order to increase and improve the delivery of important placemaking elements (greenspace, play space, renewable energy production, pedestrian & cycle routes) across the area.	Encourage (require?) all relevant parties to come together e.g. Developer Forum / WHA Regeneration Forum  Gain written agreement across parties that supports the vision and goals that the Council is seeking to achieve e.g. more public open space within the allocation area.  Through conversations with Homes England there is an opportunity to bid for significant levels of funding to support delivery of the required infrastructure at WHA. Again, this level of funding bid in Worthing is

		carried out by specific investment teams/officers. This approach is recommend for funding bids in Adur.
<b>Co-ordination with external partners</b>	There is a perception that infrastructure to support the new housing is not being delivered and perhaps that it is not going to be delivered at all which will add significant, and unsustainable pressure on existing services and infrastructure.	<p>Use or revive existing mechanisms (e.g. Growth Deal/Board, Major Projects Board)</p> <p>Clarity of what will be delivered through the use of financial contributions and when. This clear structure needs to be reiterated and considered each time a part of this infrastructure is being delivered.</p> <p>Communication with ADC and the wider community of how much has been collected (£ and % of total required) and timescales for delivery.</p> <p>Recognition of where the funding came from.</p>
<b>External Funding Opportunities</b>	The significant infrastructure costs, most notably flood defence requirements, along with increasing cost due to rising inflation are challenging the viability of delivery on the remaining sites.	Explore sources of additional funding, including but not limited to, public sector grants or loans (e.g. Homes England)
<b>Planning Policy</b>	The current national planning system is going through a period of upheaval which is and will be for some time disruptive. However, there is a clear, adopted policy framework in place for WHA which has been stable since adoption in 2017.	<p>Be clear of any changes that are going to be made to the policy position of the area (could use developer forum for these conversations).</p> <p>Provide Members with a Policy Position Statement which sets out the status of current adopted policy and changes in the national policy environment.</p> <p>Work collaboratively with interested parties working towards a Collaborative Agreement.</p>

		<p>Provide additional support to prepare an area specific design code for WHA.</p> <p>A Green Infrastructure Plan should be developed. This must include consideration of WHA, but for greatest benefit GI needs to be considered at a large scale, ideally district level.</p>
<p><b>Development Management</b></p>	<p>This allocation covers more than one site and is creating a new community/area. There needs to be greater awareness of the overall placemaking of the area/community. Infrastructure provision across the area needs to be developed and delivery in a coordinated and coherent manner.</p>	<p>Understanding of the cumulative impacts of developments across the site is required and this needs to be modelled as a priority.</p> <p>To facilitate coordinated and timely delivery of infrastructure a more proactive approach needs to be taken at district level which includes monitoring and reporting of funds received/spent to date. This could include</p> <ul style="list-style-type: none"> <li>- the development of an Western Harbour Arm specific infrastructure delivery plan,</li> <li>- introducing an Infrastructure Panel (similar peer review process like the Design Review Panel model) to provide pre-application advice/review applications</li> <li>- inclusion of strategic infrastructure considerations in a specific section in DM reports</li> <li>- requiring comments on applications from statutory bodies/infrastructure providers</li> </ul>

## Appendix 1

### The Brief: The Context of the Review

The review is to address concerns regarding the overall quantum and density of development coming forward and the level of supporting infrastructure. The review will include an analysis of undeveloped sites and how a revised 'place-based' approach is taken to the regeneration of the area to help inform the update of the Adur Local Plan.

**Part 1:** an internal analysis and review of permissions granted to date setting out what has been granted permission so far; what infrastructure has been secured, and any differences from adopted policy. This will also need to take into account the changing viability context since the adoption of the Adur Local Plan. It will also incorporate 'scenario modelling' of those sites within the WHA which are not currently being promoted/ progressed through the planning system. These scenarios will be undertaken at various densities to assess potential dwelling numbers and associated infrastructure implications. Liaison will be undertaken with these landowners to ascertain their intentions for these sites. The brief sets out the particular infrastructure types which will be addressed.

**Part 2** - a 'place-making' and design-based consideration of the remaining Western Harbour Arm sites. This will include an assessment of the visual implications of higher density forms of development (taking into account existing evidence relating to tall buildings), and will consider whether additional design guidance would be beneficial.

There is scope to provide some external assistance and a Project Manager is looking to be appointed to assist the Part 2 work. This work would also need to appoint consultants who specialise in masterplanning and urban design as well public engagement.

#### Response to Brief

Following appointment, a Stage 2 project inception discussions would take place with Officers to establish baseline of evidence. A gap analysis would be undertaken to identify where further work may be required or of benefit to the project.

Discussions (for example, in the form of workshops) would be undertaken with Councillors from Adur District to confirm the scope of the work to be undertaken as part of the Place-making element and identify key areas of focus for the project.

A draft scope would be developed, following discussions with officers and Members, to be agreed. This would include a timetable for the place-making analysis of WHA regeneration area and recommendations for the development of planning policies, specific design guidance, design guides, or other.

Based on the agreed brief, work would be carried out to deliver an appropriate place-making analysis and to facilitate the development of policy or guidance. This includes supporting officers with the procurement of external consultants as required.

## Appendix 2

### Policy Context

**Adur Local Plan (Adopted 2017)** The Adur Local Plan (adopted 2017) allocated a broad area for development and specific sites at the Western Harbour Arm (see map at Appendix 2). The Adur Local Plan allocates sites at the Western Harbour Arm for a minimum of 1100 dwellings (as well as 16,000 sqm of employment floorspace).

**Joint Area Action Plan (Adopted 2019)** The Shoreham Harbour Joint Area Action Plan 2019 (prepared jointly with Brighton and Hove City Council and West Sussex County Council) provided a more detailed policy framework and allocations for the wider Shoreham Harbour Regeneration Area (including that part which lies within Brighton and Hove City Council). The JAAP also allocates sites at the Western Harbour Arm for a minimum of 1100 dwellings (as well as 16,000 sqm of employment floorspace).

**Adur Local Plan Review (ongoing)** A review of the Adur Local Plan is currently underway. This review of the Western Harbour Arm will support and inform the ALP review.