

Shoreham Brighton  
Road Ltd

Land at 69-75 Brighton Road,  
Shoreham-by-Sea

Design and Access Statement





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The Proposed Development

1. This Design and Access Statement has been prepared on behalf of Shoreham Brighton Road Ltd (the Applicants), in relation to a full planning application for residential and commercial development on the site of Frosts Cars, Brighton Road, Shoreham-by-Sea. The planning application proposes the following development:

- 176 new residential apartments, comprising 76 with 1 bedroom and 100 with 2 bedrooms.
- 7 new commercial units, with a total floor area of around 600m<sup>2</sup>, in use class E – this allows for them to be put into retail, financial/professional services, café/restaurant, office or community uses.
- New landscaped areas within the site, and on the buildings, to provide an attractive and pleasant environment for people living within and passing through the site.
- The creation of a riverside walkway, to link in with the route to be provided

through the land to the east, and a new north-south walking and cycling route through the side.

- Car and cycle parking located underground in a basement, hidden from views, to give priority to pedestrians within the site, and ensure the site would not be dominated by vehicles.
- A net gain in biodiversity, through the transformation of a barren site to one with new planting of trees, shrubs and flowers in native species, and the creation of wildlife habitats within the site.

2. This planning application follows the refusal of an earlier application (reference AWDM/1473/21) by Adur District Council, on the basis that the scale of the proposed buildings was considered to be too great. This application presents revised proposals, with a smaller form of development. The three largest buildings have all been reduced in height by a full storey, ensuring that they would be smaller than the planned developments on the adjacent land at Free Wharf, and the site of the former Adur Civic Centre.

The appearance of all of the buildings have also been modified, to address comments from the Council’s Planning Committee members, and Officers. Other than this, the essential design of the buildings and the spaces between them is generally unchanged from the previous proposals, as the Council have not indicated a need for any change in those regards.

The Planning Application

3. This planning application is accompanied by the following documents:

- *Supporting Planning Statement*  
– Waller Planning
- *Design and Access Statement*  
– Waller Planning
- *A comprehensive suite of drawings*  
– Bryant and Moore Architects
- *Landscape Strategy*  
– Allen Pyke Associates
- *Proposed Landscaping Drawings*  
– Allen Pyke Associates
- *Townscape and Visual Impact Assessment*  
– Allen Pyke Associates
- *Heritage Statement*  
– Heritage Collective
- *Preliminary Ecological Appraisal*  
– The Ecology Partnership



- *Air Quality Assessment*  
– Hawkins Environmental
- *Noise Assessment*  
– Hawkins Environmental
- *Daylight and Sunlight Assessment*  
– Hawkins Environmental
- *Energy and Sustainability Statement*  
– Daedalus Environmental
- *Transport Assessment*  
– Stantec
- *Framework Travel Plan*  
– Stantec
- *Flood Risk and Drainage Strategy*  
– Stantec
- *Phase 1 and 2 Geo-Environmental Reports*  
– Stantec
- *Fire Statement*  
– BWC Fire Ltd
- *Utilities Information Report*  
– Stantec

## The Application Site

4. The application site currently contains Frosts Cars, a used car dealership. It is largely laid out as a car park, and covered by tarmac, with a few buildings at the site's frontage. The site has been this way since the 1970s, and Frosts Cars are now looking to relocate to new premises, which will better suit their evolving business, meaning that the site is now available for redevelopment.

5. As with much of the land on Shoreham's western harbour arm, this land has historically been used for a variety of commercial purposes. The site as it is today was in part reclaimed from the river. It was initially used as a timber merchants, with timber ponds and warehouses; later it was used as an engineering works manufacturing bicycles, motorcycles, car engines, and even anti-tank gun mountings used in the D-day landings.

## Planning Context

6. The site has been allocated for new residential and commercial development, in the Shoreham Harbour Joint Area Action Plan (JAAP), adopted by Adur Council in October 2019. Along with the broad area of land to the east, it has been identified as part of the Western Harbour Arm, as site WH7.

7. The previous planning application was developed through extensive pre-application discussions with Adur District Council, including virtual engagement with both Officers and elected Members, during the time of the Covid-19 pandemic. The proposed design was also strongly influenced by a number of meetings with an independent Design Review Panel, organised by the Council. Following the submission of that application in 2021, the Applicants engaged further with the Council, and with members of the public in a series of face-to-face public consultation events, which led to further changes to the appearance of the proposed buildings. The Council's Officers recommended that application for approval, but it was refused

following its consideration by the Planning Committee. As noted above, the current application proposals have also been amended to respond to the Council's reason for refusal, which relates primarily to the scale and massing of the proposed buildings. The proposed development has also been designed in light of the Council's policies, and in light of the context formed by the planning permissions which have been granted on other nearby sites, including the adjacent land at Free Wharf, and the Council's land at the site of the former Adur Civic Centre.

## Meeting the Need for New Development

8. There is a longstanding and very high level of need for new homes in Adur District. This is a longstanding issue, which the Council are trying to address in part, through the adoption of the JAAP. The application proposals have been designed to make efficient use of the site, to help meet the need for new homes, in accordance with the Council's policy requirements.

9. The level of housing provided recently has been well below the threshold required by the Government's Housing Delivery Test, and there is a substantial shortfall in the forecast supply of housing land. In light of the poor supply of housing land, the weight which can be accorded to local planning policies is reduced, and the application proposals benefit from a presumption in favour of sustainable development. This reduces the Council's ability to resist development on less suitable sites. In this context, it is essential for development on allocated sites such as



this one to be brought forward quickly, so as to reverse this situation. This will help the Council to resist speculative planning applications elsewhere, which would otherwise not be approved.

10. It is also important to provide new homes, following several years in which housing provision has been below the level required. The under-provision of housing has led to increasing prices, and worsening affordability. Providing new homes can help to reverse this trend, and make it easier for people to get on the housing ladder. The application proposals would make a very valuable contribution towards meeting this need. Further details are set out in our Supporting Planning Statement.

Design

11. The proposed development has been designed with careful regard for its context, both in terms of the site’s current surroundings, and the approved proposals for development on nearby land. It has also been designed to ensure it would accord with local and national planning policy requirements. These proposals have been developed through extensive discussions with Officers and elected Members of Adur District Council, an independent assessment by the Coastal West Sussex Design Review Panel, and consultation with the local community at a series of public exhibitions. The design process leading up to the submission of this planning application has taken a considerable time, and it is described within this document.

12. The proposals have been built around the key principle that access will be provided through the site. The riverside walkway, which is to be provided through the adjacent development at Free Wharf would be continued with a seamless connection. A new north-south route would also be provided through the site,

linking the river and Brighton Road. Together these routes would form a new pedestrian route linking the various new residential developments on the western harbour arm to the town centre and railway station. This would be an attractive and interesting walking route and a far more pleasant option than the existing route, along Brighton Road.

13. Space has been provided for the widening of Brighton Road, using land within the Applicant’s control. This would allow for the provision of a new cycle lane at the site’s frontage. This would help to realise a vision which has long been held by West Sussex County Council, the local Highway Authority.

14. Within the site, the landscape would be divided in to a number of separate character areas. Details of these are set out in the Landscape Strategy document by Allen Pyke Associates, which accompanies this application. These areas would include a childrens’ play area, just off the main route through the site, and separate areas including a small lawned garden area, and a space for playing boules. Many areas of planting and seating would also be

provided. This space would give pedestrians priority, although part of it would also be accessible for some limited use by vehicles, for instance for refuse collection and emergency vehicles. Car parking and the majority of cycle parking would otherwise be accommodated in a hidden basement underneath the site.

15. The proposed buildings have been designed with care, to ensure that they would make a positive contribution to the character of the local area. The site is essentially T-shaped, and it is proposed to position 3 buildings (Blocks 1, 2 and 3) on the Brighton Road frontage, and a further building (block 4) within the site, orientated north-west. Blocks 1, 2 and 3 have been designed to have similar appearances, but with subtle variations, such as through the use of buff and white coloured bricks. Block 4 would face the river, and it would use similar materials, with their light colour responding positively to longer-distance views along the river, and the buildings which it would be seen alongside, to the east and west.

16. The height of the three tallest buildings has been reduced, with the removal of a full storey of accommodation. This change has been introduced following the Council’s refusal of the previous planning application. It would ensure that the buildings would be shorter than those which the Council have approved at Free Wharf site, and the site of the former Adur Civic Centre. The buildings’ upper levels have also been carefully redesigned to minimise their apparent bulk and massing, in response to comments made by the Council’s Planning Committee.

17. The proposed development has also been carefully designed to ensure that residents would enjoy a good standard of life. All of the apartments would be provided with a private balcony, and residents would also have access to landscaped rooftop gardens. This is in addition to the vivid public realm which would be created between the buildings.



Protection from Flooding

18. The site is within Flood Zone 3, as shown on the Environment Agency’s mapping, meaning it is at a high risk of flooding. The proposed development has been designed to ensure that all residential accommodation would be set above the level of a future flood event. A safe escape route would also be provided through the site to the adjacent land at Free Wharf, and through this to higher land to the east, on Brighton Road. This would allow residents to escape the site without being put at risk from flood water.

19. Surface water would be collected and stored within the site as necessary. The majority of this would be sent back to the river, and discharged from the river wall. A small area at the front of the site would be attenuated within the site, and then released into the surface water sewer in the street. However, as the majority of the site currently discharges to this sewer, there would be a substantial reduction in water flowing from the site to the sewer. Water would also be treated through sustainable drainage measures as it passed through the site.

Minimising Carbon Emissions

20. The application site is in an ideal location for the provision of new homes. It is within around 5 minutes’ walk of Shoreham town centre, and the railway station. It is also on a major bus route. People living within the site would be able to access shops, services, schools and employment without the need to use private cars.

21. It is proposed to provide a reduced level of car parking, below that normally required by the County Council’s parking standards. Instead, residents will be encouraged to walk and cycle, or use public transport. A high level of cycle parking will be made available within the site, to help enable this. Provision will also be made for electric vehicle charging within the basement parking area. Car club spaces will be provided for residents and other people in the local area, to facilitate their living without a car of their own. The Framework Travel Plan sets out the measures which would be taken to encourage travel by “sustainable” means.

22. This strategy will help to minimise the effect the development would have on the local road network, and also on air quality within the area. The proposed development would not lead to any substantial change in the number of vehicles which use the site, with a net increase of only 76 additional annual average daily traffic movements, leading to only a negligible effect in these regards. This is illustrated by the Air Quality Assessment which accompanies this application, which itself considers the proposed development in the context of other developments which are likely to come forward in the local area in the next few years, many of which already have planning permission. The Assessment explains that the projected level of pollutants would be below the level required by the Government’s Air Quality Objectives, and the proposals would accord with local and national policy in this regard.

23. The buildings have been designed to allow them to connect to the Council’s planned heat network. This would in time provide residents with hot water, both for use in their homes, and for heating. However, as the Heat Network has not yet been set up, the buildings would also be fitted with air source heat pumps, to provide hot water; they would be accommodated in enclosures on the buildings’ roofs, which would be removed once the connection to the heat network had been provided. The buildings would also be provided with high levels of thermal insulation to reduce the energy required to heat them. These measures would help to ensure that the proposed buildings will generate very low levels of carbon emissions through their operation.

24. Measures would be provided to prevent the buildings overheating, including external shading to prevent sunlight from hitting windows. Measures would also be put in place to shelter balconies from the coastal winds. This would help to ensure that residents’ living environments would be as comfortable as possible.

Biodiversity

25. The proposed development would provide a net increase in biodiversity within the site. At present, there are no notable habitats or foraging areas for local wildlife within the site. The main asset in this regard is the river, with its mudflats being important for local birds. With this in mind, it is not proposed to alter the site’s river frontage, other than by providing a new flood defence wall. A range of measures are also proposed within the site, to ensure that new habitats and foraging areas would be provided for local wildlife; these would include the provision of cladding to the new river wall, to benefit insects and feeding birds, and a wide range of new planting within the site.



### Respecting Heritage Assets

26. There are a number of listed buildings within Shoreham, but they are largely located within the historic town centre, which is also covered by a conservation area. Foremost amongst these heritage assets is the Church of St Mary de Haura, a Grade I listed building, which dates from the 11th and 12th centuries, and which is widely visible in the local area, from its vantage point on a hill within the town centre. The development has been carefully considered in relation to views to and from the Church, and it has been determined that it would not result in any material change to these views. It would not harm the setting or significance of this important listed building. The proposals would also not cause any harm to other listed buildings within the area, or the character and appearance of the conservation area. The Heritage Statement which accompanies this application sets out further details.









### The Proposed Development

1.1 This Design and Access statement has been prepared on behalf of Shoreham Brighton Road Ltd (the Applicants), in relation to a full planning application for residential and commercial development on the site of Frosts Cars, Brighton Road, Shoreham-by-Sea. The application proposes the following development:

- 176 new residential apartments, comprising:
- 76 with 1 bedroom; and
- 100 with 2 bedrooms.
- 7 new commercial units, with a total floor area of around 500m<sup>2</sup>, in use class E – this allows for them to be put into retail, financial/professional services, café/restaurant, office or community uses.
- New flood defences, which would both protect residents within the site, and also

link to new defences on the land to the east, to provide part of a comprehensive new flood defence for Shoreham.

- New public walking routes, along the edge of the river, and north-south through the site.
- New high quality areas of public open space, for the benefit of local people.
- A net gain in biodiversity, to be achieved through the creation of new habitats within the site.
- A “sustainable” development, which would minimise future carbon emissions, both through the operation of the buildings, and transport.

### The Purpose of this Statement

1.2 The purpose of this Design and Access Statement is to explain the way in which the proposed development has been designed, and why. It explains the various issues which have influenced the design, the process which the design team have undertaken, and the way in which the proposed development would

respond to its context. It also explains the ways in which the proposed development would meet all of the requirements set by local and national planning policies.

1.3 This statement is one of a number of separate statements which accompany the application. A list of these statements is included within the Executive Summary above. This statement should be read alongside these other supporting documents.

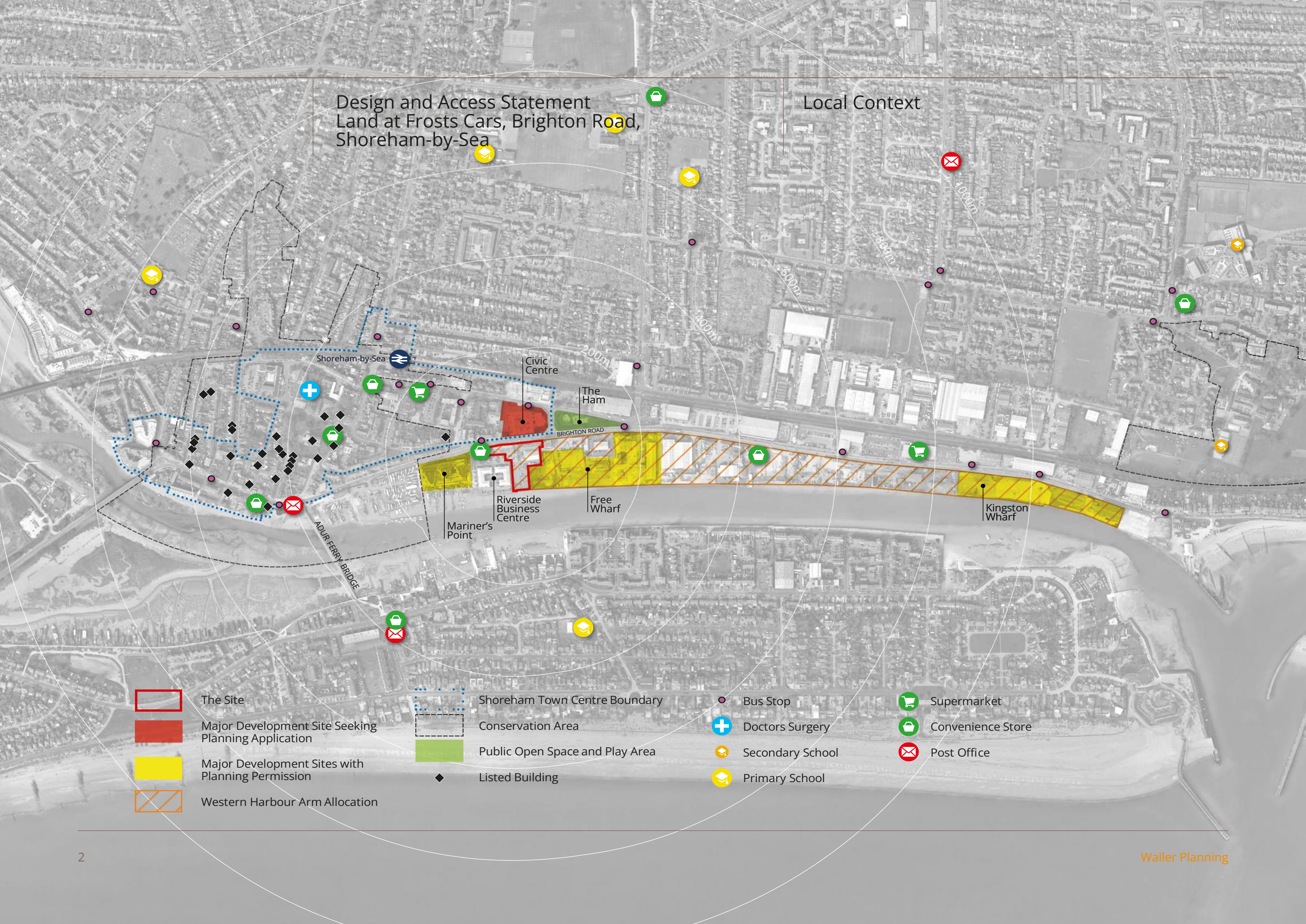
### The Design Process

1.4 The proposed development has been designed with the benefit of extensive pre-application discussion with Officers and elected Members of Adur District Council, an independent assessment by the Coastal West Sussex Design Review Panel, and engagement with the local community through a number of public exhibitions. The design process leading up to the submission of this planning application has taken over two years, and the proposals have developed and been improved significantly in that time. The process which has been undertaken is described within this document.



# Design and Access Statement Land at Frosts Cars, Brighton Road, Shoreham-by-Sea

## Local Context



The Site

Major Development Site Seeking Planning Application

Major Development Sites with Planning Permission

Western Harbour Arm Allocation



Shoreham Town Centre Boundary

Conservation Area

Public Open Space and Play Area

Listed Building

Bus Stop

Doctors Surgery

Secondary School

Primary School

Supermarket

Convenience Store

Post Office



### Accessibility

2.1 The site is located around 5 minutes' walk to the east of Shoreham-by-Sea town centre, and a similar distance from the railway station. It is better located in this regard than the other sites in the Western Harbour Arm. It is also located on Brighton Road, which is a busy bus route, and from which it is possible to catch a bus to a range of locations, including a service to Brighton, which runs with a 10-minute frequency throughout the day on Monday – Saturday, and with a 20 minute frequency in the evenings, and on Sundays. Further details are set out in the Transport Assessment by Stantec, which accompanies this application.

2.2 People living within the site would easily be able to access shops, services and jobs within the local area, and also to travel further afield to Brighton and London. It is realistic to expect that people would be able to live without the need to rely on travel by private car.



East Street, in Shoreham-by-Sea town centre, contains a range of typical town centre shops, cafés and restaurants.



Brighton Road is a major bus route.

2.3 Shoreham-by-Sea town centre contains a range of local convenience shops, small supermarkets and food shops, cafés, restaurants and pubs, as well as facilities including doctors, pharmacies, dentists and vets. The majority of residents' day-to-day needs can be met within the town, within a 5-10 minute' walk of the application site. Details of local facilities, and their location relative to the application site, are shown on the map overleaf.





- The Site
- Town Centre
- No. 700 Bus Route from Little Hampton to Brighton

- General Hospital
- Secondary School
- Primary School

- Supermarket
- Railway Station



### The Western Harbour Arm

2.4 The application site is located within an area allocated for development by the Shoreham Harbour Joint Area Action Plan (JAAP), identified as CH7: Western Harbour Arm. The various sites allocated for development in this area are allocated for mixed use development, and they are required to provide many of the new homes and jobs required to meet the area's current and future needs. The application site is identified as site WH7. The relevant maps from the JAAP, identifying these areas, are shown overleaf.

2.5 As noted in the JAAP, 'Shoreham Port is the largest commercial port between Southampton and Dover, and the closest port to London'. The area is of economic importance in the area, employing a large number of people, many associated with the import and export of aggregates, timber, steel, oil and cereals.

2.6 However, the Western Harbour Arm contains a large area of commercial land which has now fallen vacant. The Council have recognised that much of this land can be put to a more productive use, including the application site.

2.7 The particularly valuable resource which this land has is the adjacent river. This has been essential to its historical employment uses. But in the context of new residential and commercial development, the river offers an opportunity to create a unique and distinctive environment of a very high quality, and a desirable place to live and work.

2.8 At present, little of this land is easily visible from the public realm. Most of the land is enclosed, and only limited views are available from Brighton Road. The road itself is also not a pleasant one to walk along, due to the often narrow footpath, and pollution from the busy road. The redevelopment of the Western Harbour Arm offers a significant opportunity to improve the walking and cycling environment in this key east-west route between Shoreham and Southwick.

2.9 The JAAP sets out various priorities for new development within the Western Harbour Arm, which include the following:

- For development to be comprehensive;
- To improve permeability throughout this area, and connections to the town centre and surrounding area;
- To create high quality buildings and public areas;
- To maximise intensification and redevelopment opportunities of existing lower-grade, vacant and under-used spaces;
- To free up waterfront opportunity sites;
- To deliver a comprehensive flood defence solution integrated with a publicly accessible waterfront route including pedestrian / cycleway and facilities for boat users;
- To mitigate noise and air quality impacts;

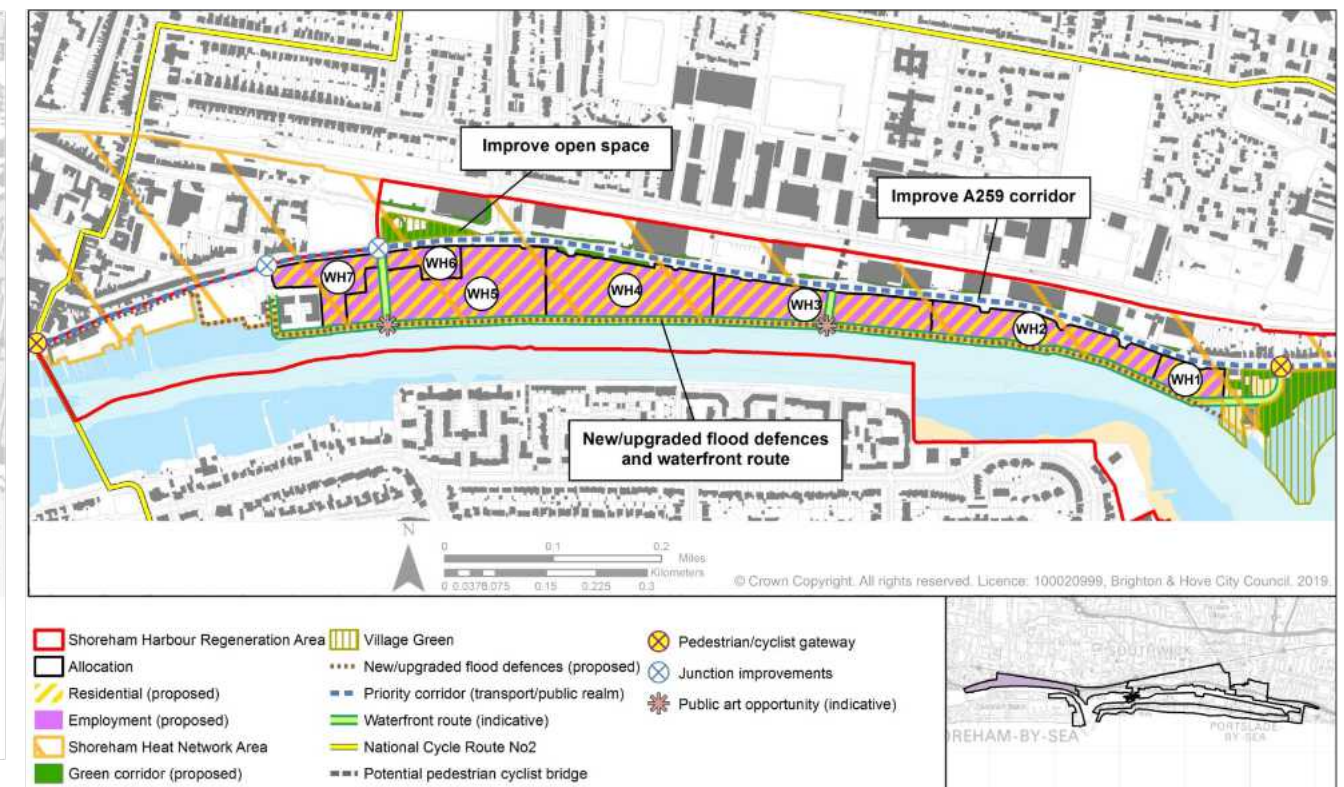
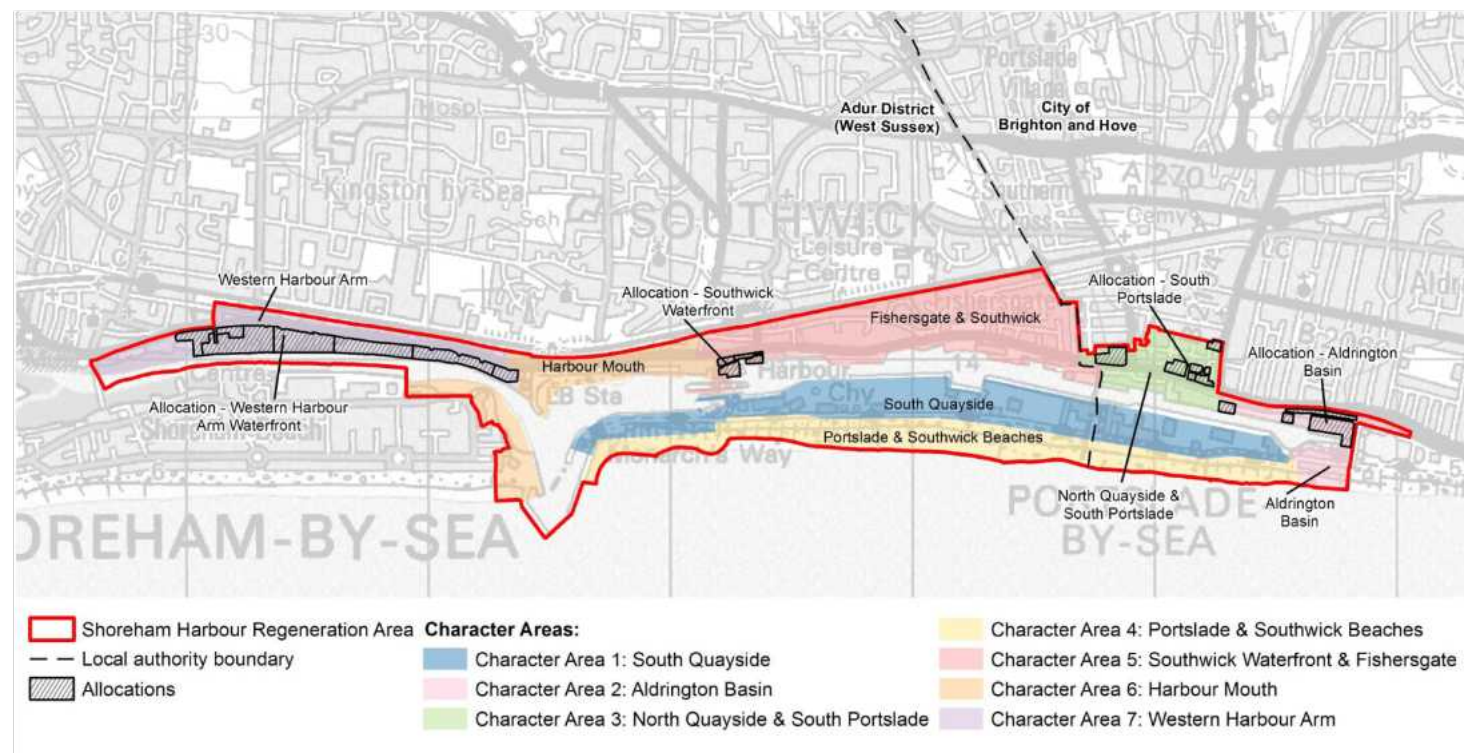
- To enhance biodiversity;
- To support the delivery of the Shoreham Heat Network.

2.10 Policy CAT of the JAAP sets out how these priorities will be achieved. It also contains a requirement that development should be of a minimum of 100 dwellings per hectare (with no maximum set). And it contains guidance on building heights, which is discussed below.



# Design and Access Statement Land at 69-75 Brighton Road, Shoreham-by-Sea

## Contextual Appraisal



Map 3 – Character Areas  
From the Shoreham Harbour Joint Area Action  
Plan (JAAP).

Map 12 – CA7: Western Harbour Arm  
From the Shoreham Harbour Joint Area Action  
Plan (JAAP).



### The Ham – Public Open Space

2.11 To the north-east of the application site is an area of public open space, known as The Ham. This area has remained undeveloped since at least the 19th century, and it is visible in historic maps as early as 1873, identified as “Ham Common” (see Section 3 below, and the Heritage Statement). The Ham is today largely laid out to grass, with trees around its edges, and a skate park at its western end. There may be the potential to enhance this space in some ways, with funding from the current application and other developments in the area. The open space at the Ham will be of great value to new residents, as it already is to the area’s existing residents.



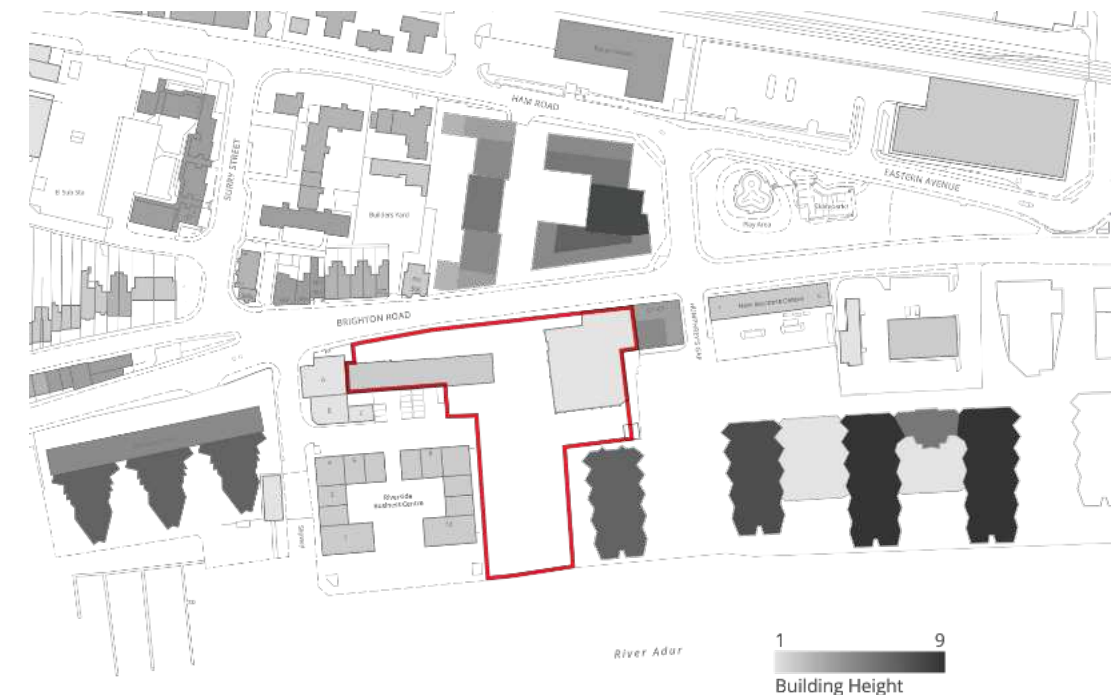
The Ham.



The skate park at The Ham.

### Building Heights

2.12 It can be seen from the drawing opposite that there are a variety of building heights in the area. This drawing shows that there are some taller buildings, of 7–9 storeys, in the recently completed Mariner’s Point development (on the site of the former Parcelforce depot, to the west of the application site), and in the approved development at Free Wharf, which is currently under construction (to the immediate east of the application site). Buildings of three and four storeys are also common in this area. The Council have also resolved to grant planning permission for a development of between 5 and 9 storeys on the Brighton Road frontage opposite the application site, on the site of the former Adur Civic Centre. All of these existing and planned developments are shown on the plan opposite, although it should be noted that at the time of writing, the Free Wharf development remains under construction, and the redevelopment of the Civic Centre site is yet to begin. Further details of these developments are set out in Section 4 below.



The heights of existing and proposed buildings in and around the application site.



# Design and Access Statement Land at 69-75 Brighton Road, Shoreham-by-Sea

## Contextual Appraisal

Plan EDP8, from the Council's Tall Buildings Capacity Study.





2.13 Adur District Council commissioned the Tall Buildings Capacity Study from consultants EDP, as part of the evidence base for the JAAP. The Study specifically considers the scope for tall buildings within the Western Harbour Arm area, including on the application site. Plan EDP8 of the study is reproduced opposite. This shows three “view cones”, between each pair of purple arrows, which should be kept free of tall buildings, to preserve existing views through the Western Harbour Arm to the South Downs; none of these view cones touches the application site.

2.14 The application site is at the western end of the area identified on Plan EDP8, within an area coloured orange. In this area, the Study notes that buildings of up to 6 storeys in height are “unlikely to have a significant impact on the design objectives” of the Study. The Study also notes that buildings which are taller than 6 storeys “may be acceptable... as long as the design objectives are addressed, subject to specific testing”.

2.15 The design objectives referred to above are set out on EDP8, and they are also reproduced opposite. They require the prominence of St Mary de Haura Church to be retained; this would be the case, and we discuss this further below. They also relate to the prominence of other important heritage assets, which would not be affected by development on the application site. The proposed development would not contravene any of the guidance in this Study.

2.16 Policy CA7 of the JAAP also contains guidance on building heights. It does not set maximum requirements but notes that buildings can generally have five stories fronting Brighton Road and the river, stepping up higher than this within the centre of developments. It also provides qualitative guidance on factors to consider in relation to building heights.

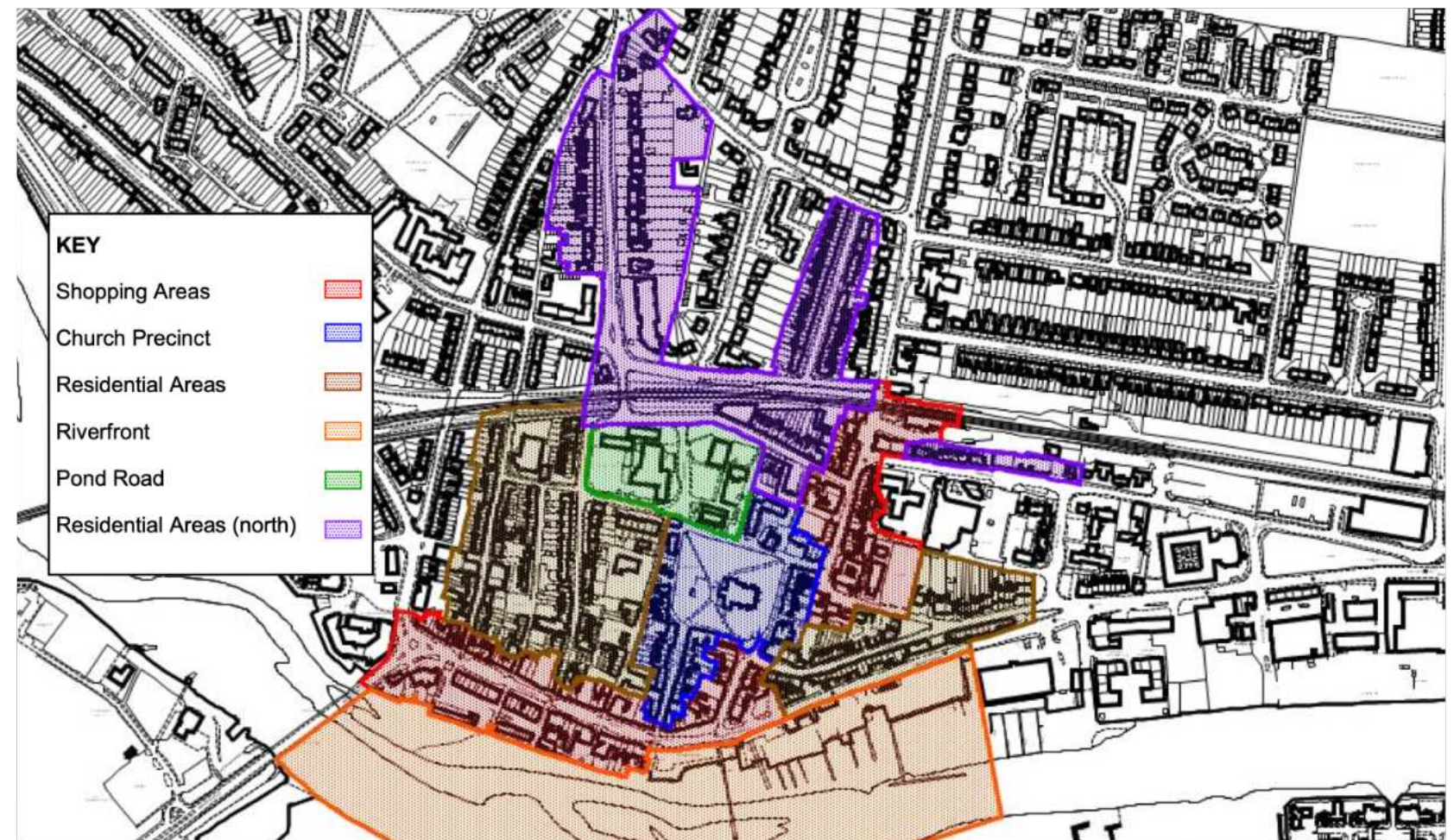


The depths of sites within the Western Harbour Arm allocation.



2.17 Policy CA7 of the JAAP also contains guidance on building heights. It does not set maximum heights, but states that “Building heights of up to five storeys are generally considered acceptable on the Brighton Road and River Adur frontages. Away from these frontages, greater storey heights may be acceptable within deeper sites.” The application site is one of the deepest sites within the Western Harbour Arm allocation, meaning that greater building heights are acceptable within it. Following the guidance in the Tall Buildings Study, Policy CA7 also specifically seeks to restrict the height of buildings within the sites which are close to Kingston Buci Lighthouse, and in the central part of the Western Harbour Arm in order to preserve views of the South Downs, and generally in relation to views of St Mary De Haura Church; none of these restrictions apply to the application site, and so unlike other sites in the allocation, it is not specifically mentioned within the policy.

2.18 The proposed development would accord with the JAAP’s policy requirements relating to building heights. In addition, it is also relevant to note that national planning policy expects policies relating to the density of new residential development to be considered in light of the relative need for housing. This matter is discussed further in the Planning Statement which accompanies this application. In addition, we consider the proposed building heights further in Sections 5 and 6 below.



Map from the Council's Shoreham-by-Sea Conservation area Character Appraisal and Management Strategy, showing character areas within the conservation area.



## Shoreham-by-Sea Conservation Area

2.19 The Shoreham-by-Sea conservation area is concentrated around the town centre, which is the historic core of Shoreham. The application site falls outside of the conservation area, which ends around 70m from the site's western edge. The conservation area is considered in the Council's Character Appraisal and Management Strategy (2008), which identifies a number of character areas within it, shown on the map opposite. The application site is located to the east of an area labelled "residential areas". The site is visible obliquely on Brighton Road from

this area, and also in views to the east from the "riverfront" area, such as from the Adur Ferry foot bridge.

2.20 The Council's 2008 assessment describes the eastern setting of the conservation area (meaning the area in the vicinity of the application site) as being of poor quality, and in need of regeneration. Since this assessment, the former Parcellforce site (now known as Mariner's Point), which is immediately adjacent to the conservation area's boundary, has been redeveloped.

2.21 The Heritage Statement which accompanies this application notes that, in its present form, the application site makes no contribution to the conservation area's heritage significance. This is due to its nondescript modern buildings, and the lack of any visual or physical link with the conservation area.



4. View from Riverside Road.



1. The listed buildings at 55 and 57 New Road.



2. View from the churchyard.



3. A typical view of the Church within the town centre.



5. View from Emerald Quay.





Key listed buildings and viewpoints.

## Listed Buildings

### 55 and 57 New Road

2.22 The closest listed buildings to the application site are a pair of Grade II listed buildings at 55 and 57 New Road. These are two-storey houses, dating from around 1830, located around 70m to the west of the site. The Heritage Statement notes that they are of historic and architectural value, due to their age and design, which is of a typical Regency style. The Heritage Statement also concludes that the application site makes no contribution towards the setting or significance of the listed pair.

### St Mary de Haura Church

2.23 St Mary de Haura Church is a Grade I listed building, which dates from the 11th and 12th centuries. It is the only Grade I listed building within Shoreham-by-Sea town centre. It sits on elevated ground, and is widely visible within the town centre and immediate surroundings, particularly in views from the south. These views contribute to its significance as a heritage

asset. The Conservation Area Assessment notes that the Church is “the primary landmark of the conservation area”.

2.24 One of the key tasks addressed by the Tall Buildings Capacity Study, mentioned above, was to identify key views of the Western Harbour Arm site, with reference to “the key and significant buildings and cultural reference points that contribute to the unique character of Shoreham”, the first mentioned of which is St Mary de Haura Church. Policy CA7 of the JAAP requires development to protect and enhance views of the Church, and the policy’s supporting text requires developers to consider the potential impact on views of the Church. The Study notes that the main points from which the Church is visible are from opposite the High Street (View 3), from Norfolk Bridge, and the South Downs to the north.

2.25 Plan EDP8 of the Tall Buildings Capacity Study (see above) identifies the importance of maintaining key views of the Church. The specific views it identifies are those from the Adur Ferry Bridge, and various views from the west and north. The



application site is not located close to any of these views. The only one of these views in which the application site could be considered to be visible is from the Adur Ferry Bridge. However, in that view the church is clearly visible in line with the path of the bridge itself, whereas the application site is some distance off to the side, and it is necessary for the viewer to turn their head, so that the two are not really visible at the same time. The two are only shown together in one view within the Tall Buildings Study, which uses a wide-angle lens, in which the width of the image is clearly discernible from the distortion created by the lens. The site is clearly distant from the Church, and it would also be seen in the context of other new residential development, including that at Mariner's Point, and the Free Wharf site beyond.

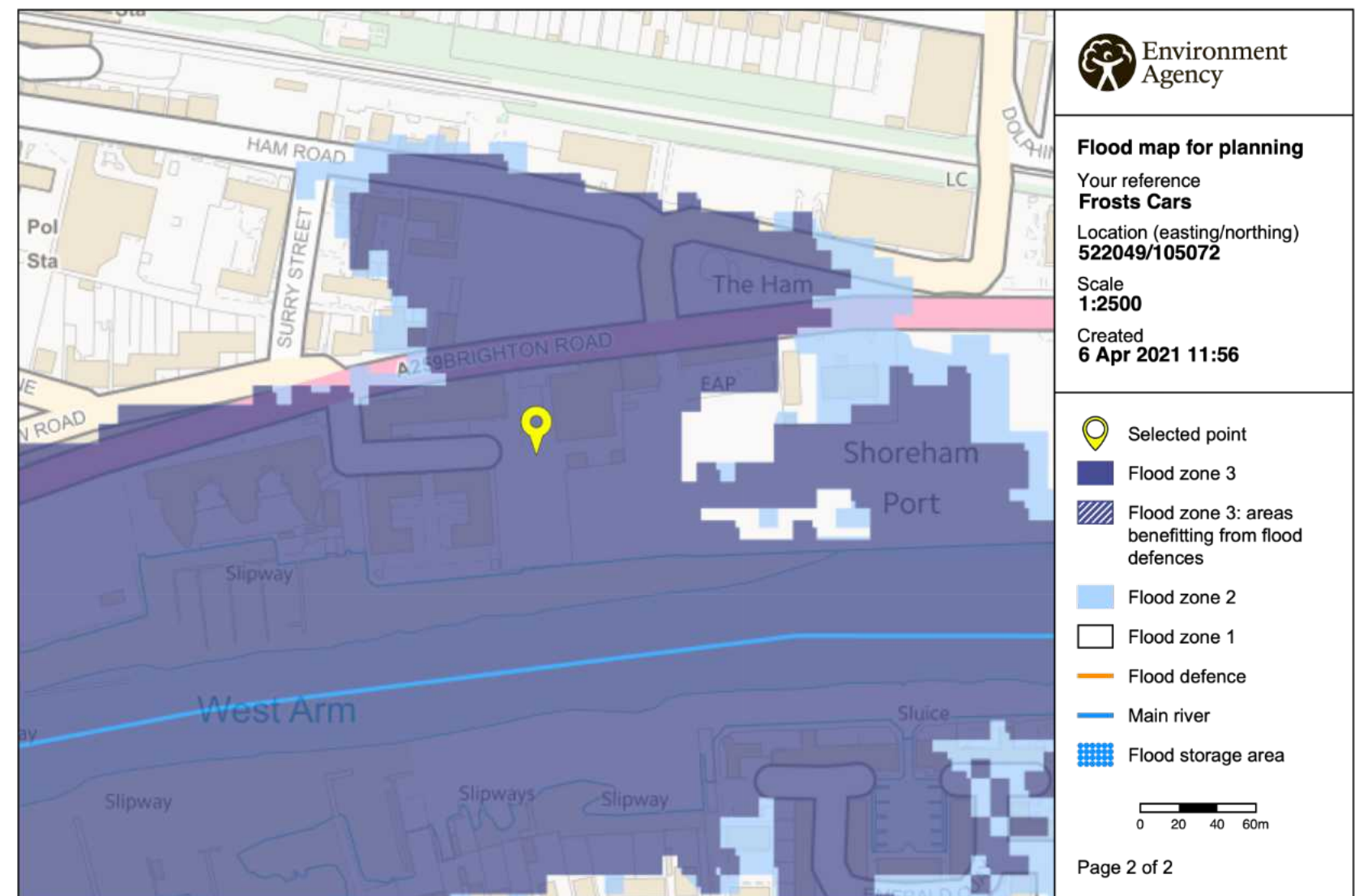
2.26 The Church is also hidden in views from the southern bank of the River Adur. A view of the Church is available from Riverside Road (see View 4, above), but the application site is peripheral in this view, if it can be seen at all. What is far more prominent is the development at Mariner's Point (on the former Parcellforce site). Further to the north, on Emerald Quay,

there would once have been a view of the Church which passed over the application site; however, this view is no longer available, having been blocked by the Mariner's Point development – see View 5. Any new development on the application site would not obscure any existing view of the Church.

2.27 It is clear that new development on the application site would not harm the setting or significance of St Mary de Haura Church. This opinion is shared by Heritage Collective, the authors of the Heritage Statement, and it was also established at the pre-application stage that it was common ground with the District Council's Officers, and the members of the Design South-East Review Panel.

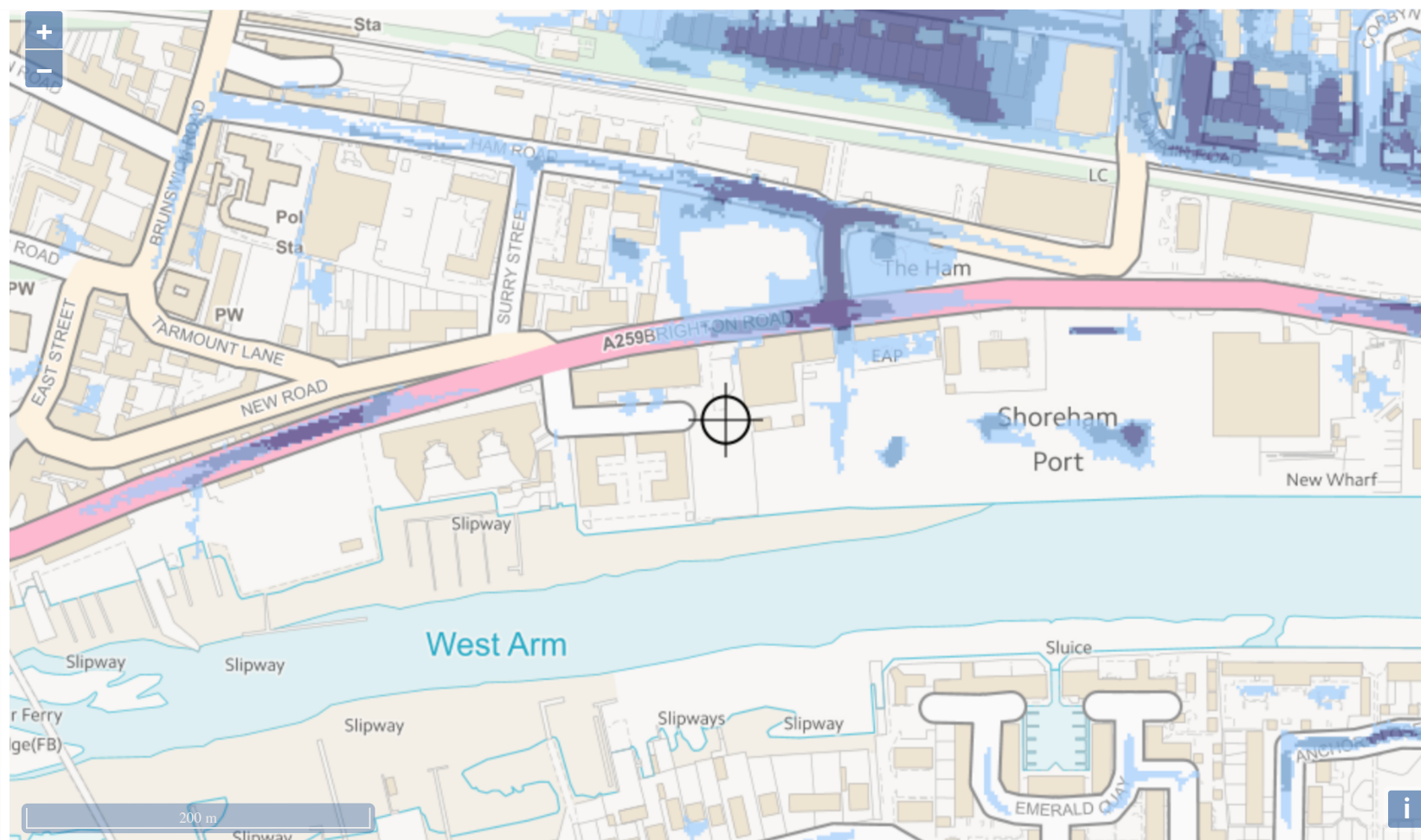
### Flood Risk

2.28 The application site is within an area identified by the Environment Agency as Flood Zone 3, meaning it is at a high risk of flooding (land in dark blue on the flood map adjacent image). This means it has a 1 in 200 or greater annual probability of flooding from the sea. The risk is primarily from tidal water from the River Adur, and



The site is identified as lying within Flood Zone 3, on the Environment Agency's Flood Map for Planning.





Extent of flooding from surface water

● High 
 ● Medium 
 ● Low 
   Very low 
 ⊕ Location you selected

The Environment Agency's surface water flood map.

not from surface water. This application is accompanied by a Flood Risk and Drainage Strategy by Stantec, which considers this risk, and sets out the application's response, demonstrating that the proposed development would be made safe from the effects of flooding. We discuss the proposed strategy for mitigating flood risk below, in Section 6 of this statement.

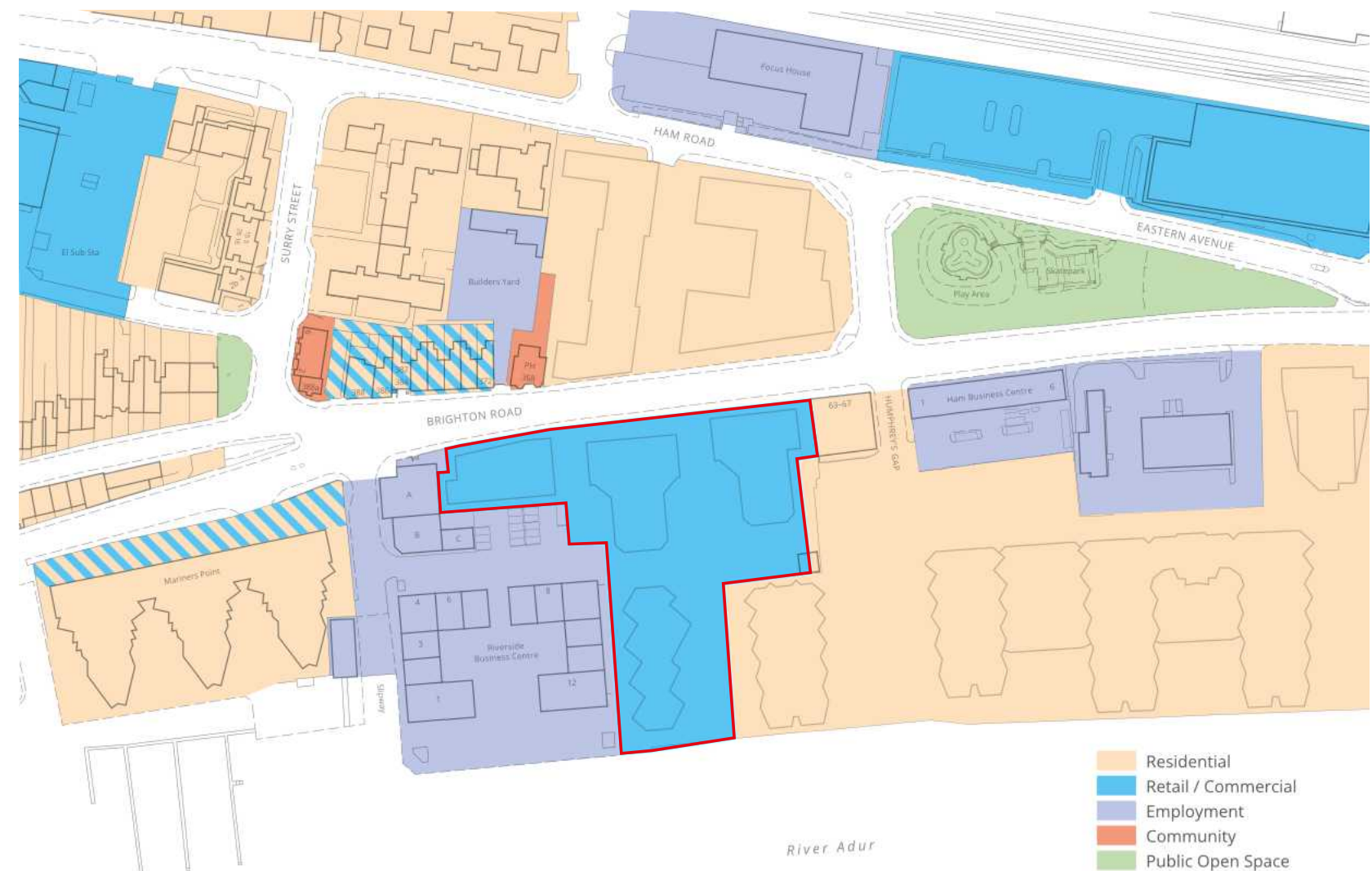
2.29 The JAAP requires new developments within the Western Harbour Arm to provide new flood defences, which will be sufficient to meet the risk of flooding both now, and in the future, taking into account the anticipated effect of climate change, with the possibility that this could lead to rising sea levels.

2.30 It is necessary for proposals for residential development, which is defined by national planning practice guidance as a "more vulnerable" land use, to be subject to the flood risk sequential and exception tests. The sequential test requires consideration of whether there are alternative sites on which the proposed residential development could

be located, which are at a sequentially lower risk of flooding (i.e. within either flood zone 1 (low risk), or if not, within flood zone 2 (medium risk)). This assessment has already been undertaken by the Council, in the process of preparing their Local Plan, and it has been demonstrated that the residential development required to meet the District's housing needs could not be located elsewhere. As such the sequential test has already been passed, and it is not necessary to undertake any further assessment in this regard in relation to the current planning application.

2.31 The flood risk exceptions test requires both that the proposed development must be made safe from flooding, and not increase the risk of flooding elsewhere, and also that it would provide further sustainability benefits to the community, which outweigh flood risk. The accompanying Flood Risk Assessment by Stantec and the Planning Statement by Waller Planning demonstrate that these respective requirements would be met.







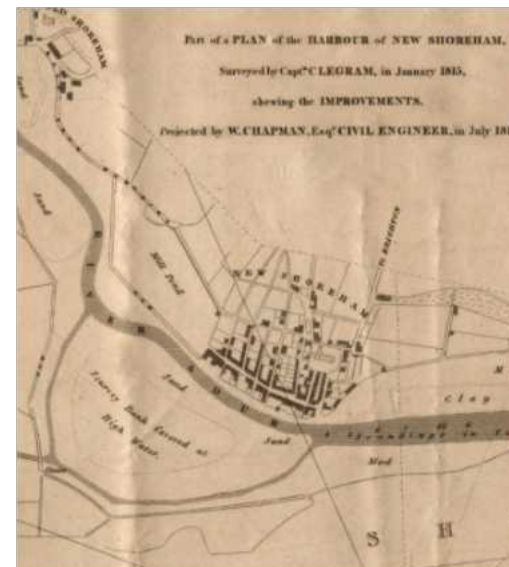




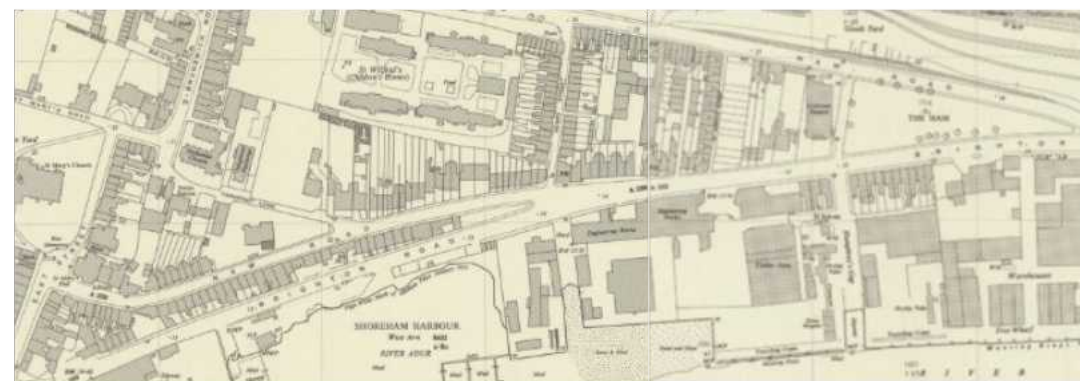
### The Site's History

2.1 The application site's history reflects that of the wider area, in that it has for many years accommodated various commercial uses. Much of the land within the site was reclaimed from the river and the broad mud flats which surrounded it. This is clearly visible in the 1813 map, but even the 1947 map notes the presence of sand and mud on the site's southern edge.

2.2 The site has historically accommodated timber ponds, and these are labelled on the 1873 map. These ponds were used to store timber, preventing it from drying out before it was used in the repair of mills. The site was used by timber merchants in the 19th century.



Historic map extracts from 1813 (above),  
1873 (above right), 1947 (right) and 1954 (below).





## Design and Access Statement Land at 69–75 Brighton Road, Shoreham-by-Sea

## The Application Site

3.3 Holloway Engineers Ltd moved to the site in the 1880s. This company continued the timber merchant business, but also diversified into various other areas. It specialised in engineering, producing machines for use in hospitals and factories, and also repairing and hiring out agricultural machinery. In the early 20th century, the business diversified further into the motor car industry, as the mill work ended. This continued into the 1950s and 60s, with the manufacture of engines for major car manufacturers including Austin and Morris. The company also produced anti-tank gun mountings and steelwork parts for the D-Day Mulberry Harbour during World War 2. The site remained in use as an engineering works until 1973, when it was compulsorily purchased.

3.4 The road to the east of the site, Humphrey's Gap, is named after James Humphrey, brother of Harriet, who married James Holloway in 1867. James Humphrey built villas on Eastern Avenue, to the north-east of the site, but these have since been demolished.

3.5 The application site has been in use as a car dealership, and at one point as a petrol filling station, since its compulsory purchase in 1973. Some photographs of the site in the 1970s and 80s are included opposite.

3.6 A more detailed and fully referenced assessment of the application site's history is included within the Heritage Statement by Heritage Collective, which accompanies this application.



Photographs of the Frosts Car Dealership within the site, in the 1970s and 80s.

## Planning History

3.7 The majority of the site's planning history relates to its previous uses. For instance, there have been a number of applications relating to the existing buildings within the site, and signage.

3.8 In addition, the Council's Planning Committee resolved to grant planning permission for a new Morrisons supermarket, in December 2013. This would have been a very large development, which would have covered both the application site, and the adjacent Free Wharf site, to the east. However, the s106 legal agreement was never completed, and so planning permission was never granted.



Images (right) of the previous proposals for a Morrisons supermarket on the application site and the Free Wharf site.



## The Application Site Today

3.9 Today, the application site accommodates a used car dealership, Frosts, a family owned and run business. The site's frontage is dominated by sales buildings, which are commercial-scale single-storey buildings, with largely glazed frontages, and parked cars. Behind the frontage, on the eastern side of the site, are a series of buildings used for car servicing and repairs. On the western side of the site, behind the frontage, is a two-storey building which accommodates a sales area on the ground floor with administrative offices above. The remainder of the site, and more than half of its total area, is covered by tarmac and used for parking cars.

3.10 Whilst the site accommodates a range of uses such as car repairs, administration and sales, these uses are all ancillary to the site's main use, which is as a car dealership. The site's use is therefore sui generis, meaning that it does not fall within any of the defined use classes.

3.11 The site's river frontage is incidental to its current use. The site benefits from impressive and attractive views over the water, but the site's current purpose makes no use of them. There is also no public right of access through the site to the river frontage at present.

3.12 One of the key issues highlighted by the JAAP is a need to provide better flood defences for Shoreham. The application site's river wall is in a very poor condition, and is very badly corroded, as can be seen in the photograph opposite. This application proposes to provide a new piled river wall in front of the existing failing defences. The new wall will provide an effective flood defence, and also help to enhance the site's biodiversity value, through the addition of timber baulking to its outer edge.



The application site's Brighton Road frontage.



The application site's Brighton Road frontage.



Services and repairs are carried out within the site.



Services and repairs are carried out within the site.



The two-storey sales and administrative building.



Much of the site is laid out as car parking, and covered by tarmac.



The site's river frontage.



The site's river frontage.



The site's river wall is in a poor condition, and in urgent need of replacement.









Development underway on the Free Wharf site, immediately adjacent to the application site (September 2020).



- Application Site
- Free Wharf Site
- Riverside Business Centre
- Civic Centre Site
- Former Parcellforce Site

### Free Wharf

4.1 Free Wharf lies to the immediate east of the application site. Planning permission (reference AWDM/1497/17) has been granted for its redevelopment to provide the following development:

- 540 dwellings, comprising:
  - 2 × studio apartments;
  - 179 × 1-bedroom apartments;
  - 323 × 2-bedroom apartments; and
  - 36 × 3-bedroom apartments.
- 2,707 sq m of commercial floorspace, comprising a mix of retail, cafes / restaurants, offices.
- 512 car parking spaces and 568 cycle parking spaces.
- A new river wall and flood defences, and pontoons within the river. This planning permission was issued in August 2018.

4.2 Work has begun on the construction of the approved development, at the eastern end of the site. The final phases of development will be at the western end, adjacent to the application site. A further application has also been submitted (AWDM/1315/22), which proposes the addition of a further 47 dwellings within the site, by reconfiguring and expanding the approved buildings which are yet to be constructed; at the time of writing, this application has not yet been determined by the Council.

4.3 The Free Wharf site forms a very important aspect of the context for the proposed development on the application site. The Applicants are communicating with the developer of the Free Wharf site, Southern Housing Group, to ensure that the proposals for both sites will be seamlessly integrated on the ground. The buildings and landscaped areas of the proposed development have been designed with care, to ensure that they would sit comfortably next to the approved development at free Wharf. Further details in this regard are set out in Section 6 below.

4.4 The development at Free Wharf was granted planning permission prior to the adoption of the JAAP, but it has nevertheless been designed with the intention of implementing many of the JAAP's policies, having been designed with the policies of the emerging draft JAAP.

### Former Civic Centre Site

4.5 The Adur Civic Centre was the headquarters of Adur District Council, until 2017, when the Council moved to the Shoreham Centre. The Civic Centre was demolished soon after the Council vacated it, to save on business rates. The site is immediately to the north of the application site, and it has lain vacant for the last few years.

4.6 The Council have now resolved to grant planning permission (under application AWDM/1450/21) for the site's redevelopment to provide 159 apartments, with at least 30% affordable housing, and commercial floor space at ground floor level, in class E use. This would involve the provision of buildings ranging in height from 3 to 9 storeys in

height. The proposals for the Civic Centre site are shown in drawings used throughout this statement, to explain the way that the application proposals would look alongside them. The development proposed by this application has been designed with reference to these proposals.



View of the proposed development on the site of the former Adur Civic Centre – image courtesy of ECE Architects.



## Design and Access Statement Land at 69–75 Brighton Road, Shoreham-by-Sea

## Surrounding Development



The approved buildings within the Free Wharf site, on its Brighton Road frontage, would effectively be six storeys tall, with a double-height commercial ground floor, stepping up higher behind this frontage.



3D view of the proposed development at Free Wharf – image courtesy of Southern Housing Group.



The approved development at Free Wharf – Landscape Masterplan – image used courtesy of Southern Housing Group and Allen Pyke Associate.



### Riverside Business Centre

4.7 The Riverside Business Centre lies immediately to the west of the application site. It is used by a number of businesses, for a mixture of light industrial and office purposes. The site contains two-storey buildings dating from the late 1980s.

4.8 This development reclaimed an area of mudflats from the river, and created a new river wall; however, the flood defences within the site are inadequate to meet anticipated future flood levels, and there is a need to improve defences within this site, to complete the flood defences proposed along the length of the Western Harbour Arm, and so protect Shoreham from flooding. Further details in this regard are set out below.



The Riverside Business Centre, seen from within the application site.



Buildings within the Riverside Business Centre, with the recent development at Mariner's Point, visible over the top of the buildings.

### 63–67 Brighton Road

4.9 Planning permission was granted in 2017 for the demolition of the two and three-storey buildings which previously occupied the site, and the construction of a five-storey apartment block, with commercial space at ground floor level, in café/pub/office use. The fifth storey is set back from the street frontage, and only visible in longer-distance views along the street, but not from the pavement close to the building.

4.10 The building has now been constructed. It presents a blank elevation to the application site, allowing for new development to be located close to its flank wall. It is of a simple modern design, with regularly spaced windows and a rendered finish.



The recent development at 63-67 Brighton Road.



View looking east along Brighton Road, with the application site in the foreground, and the blank wall of the new development at 63-67 Brighton Road.

### Northern Side of Brighton Road

4.11 Opposite the application site are two and three-storey buildings. These include a small terrace of shops, accommodating estate agents and cafés, plus the Duke of Wellington, a pub and live music venue, as well as residential accommodation. Behind this is Bramber House, a building in use as offices, with a car park / builder's yard to the front.

4.12 These buildings date from the 19th and 20th centuries. The Duke of Wellington is an attractive and ornate building, whilst the other buildings are of a more utilitarian nature. They are outside the conservation area, and of no particular architectural importance.

4.13 There will be a difference in scale, with the introduction of the proposed development. This has already been accepted, through the policies of the JAAP, which allow for development of five stories on the Brighton Road frontage,





View looking west along Brighton Road, with the application site on the left, and two-storey commercial and residential development opposite.



The Duke of Wellington, opposite the application site, a pub and live music venue.

stepping up higher away from this frontage. The Mariner's Point development (see below), whilst outside the area covered by the JAAP, has already introduced development of a larger scale to Brighton Road. This change is an inevitable consequence of the need to provide homes within a limited urban area

### Montgomery Motors, Brighton Road

4.14 To the immediate west of the application site is Montgomery Motors. This site is in use for vehicle repairs. The building is a typical late 1980s commercial building. The application site abuts this building, and it will be necessary to demolish the adjoining building.



View of Montgomery Motors, looking west along Brighton Road, with Mariner's Point visible behind.



A building within the application site which is attached to the Montgomery Motors garage.

### Mariner's Point (Former Parcelforce Site)

4.15 Mariner's Point is a mainly residential development, with commercial units at ground floor level, facing Brighton Road. It has a five-storey frontage on Brighton Road, and rises to seven storeys behind. The road frontage is a continuous flat elevation, with a variety of inset and cantilevered balconies. We understand that this building received many negative comments from local people, due to its continuous frontage and bland appearance.



The recent Mariner's Point development, seen from within the application site.





Commercial units on the Brighton Road frontage of Mariner's Point.



The Mariner's Point development, viewed from the riverside.

### Focus Group Building

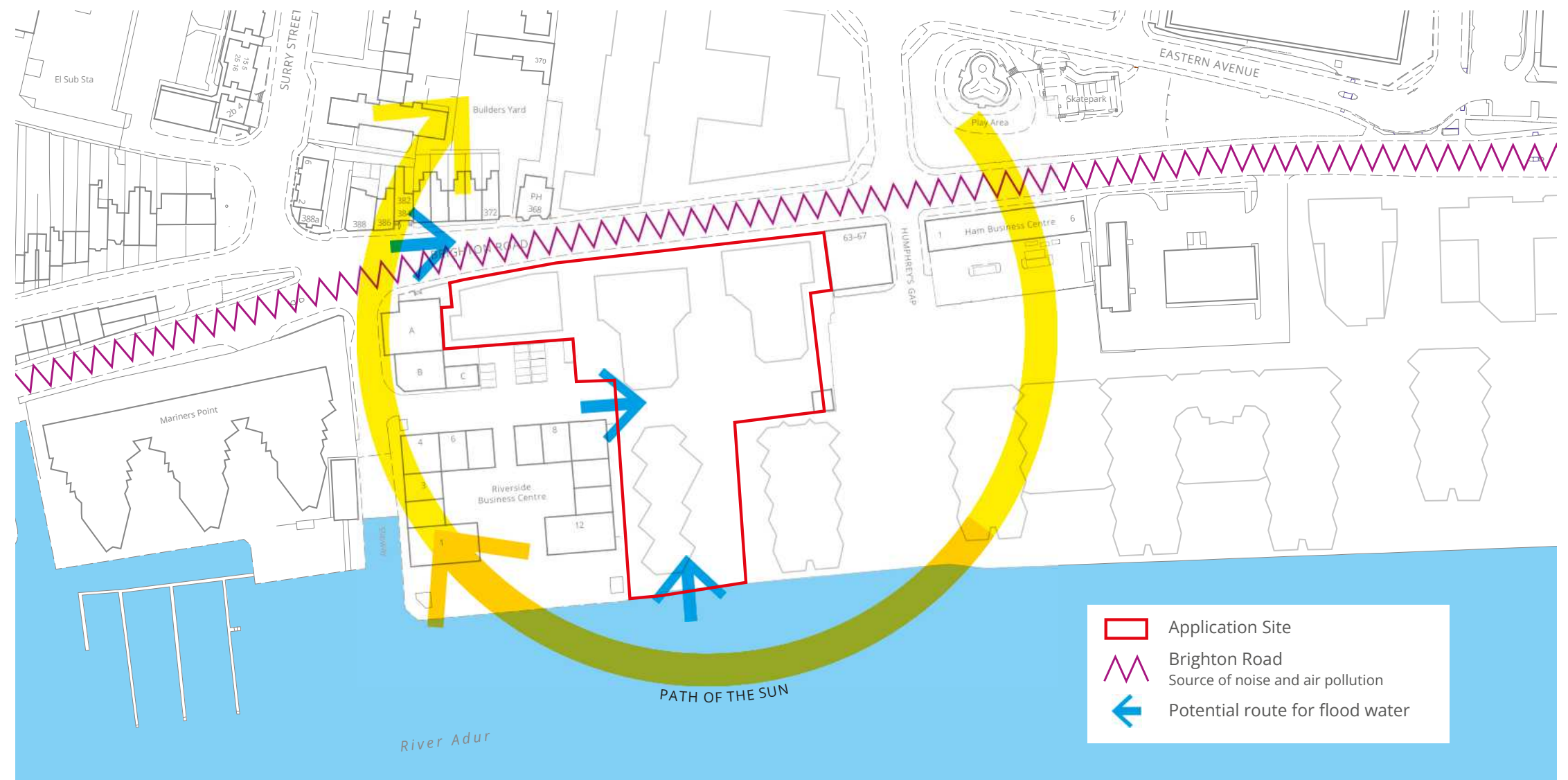
4.16 The Focus Group Building was constructed recently, as offices for the eponymous Focus Group. It is a distinctive modern building, of four storeys in height, which is located immediately to the north of the Civic Centre site and so also close-by to the north of the application site. It is a further contributor to the taller scale of development which is coming about with new developments in this area, reflecting an efficient use of the available land. Its appearance is also markedly modern, with large windows and the use of a mixture of grey brick and terracotta-coloured cladding. It provides a visual reference point for development on the application site.



The Focus Group Building.



Constraints





### Constraints

5.1 There are a number of issues which if not mitigated would constrain the potential for new development on the application site, as follows:

- Flood Risk – As we have noted in Section 2 above, the application site is at risk of flooding. This risk is from the River Adur, which is tidal in this area, meaning that the level of the water rises at high tide. The land to the east of the site, at Free Wharf, will be protected by flood defences to be provided with the redevelopment of that land, which are currently under construction. However, the flood defences on the Riverside Business Park site, to the immediate west of the application site, are inadequate to meet anticipated future flood events. This means that there is a risk of the application site flooding not only from the river to the south, but also from the west, and also from Brighton Road to the north. The application site therefore has to be designed with flood defences to counter this threat.
- Noise – Brighton Road is a busy route, being the main east-west route within the District. It is a busy route, with a relatively high level of vehicular traffic. This means that it is also a source of noise, which must be mitigated. A Noise Assessment by Hawkins Environmental shows that levels of noise at the application site's frontage are such that residential development can only be accommodated there with mitigation measures, such as enhanced glazing and ventilation.
- Air Pollution – The high volume of traffic which uses Brighton Road generates exhaust emissions which worsen local air quality. As with noise, this can worsen the quality of the environment on Brighton Road. The site is close to, but outside, an Air Quality Management Area (AQMA), which covers the town centre, to the west.
- Path of the Sun – The site is essentially T-shaped, and has its widest area at the northern end, next to Brighton Road. In order to make efficient use of this part of the site, and to present a positive

façade to the public realm, it is necessary to provide a building facing Brighton Road. This will in effect necessitate a limited number of apartments that will be entirely north-facing, within limited access to direct sunlight. Conversely, some apartments could also have a high level of exposure to sunlight, and this may require measures to avoid overheating, such as providing shade to their windows.



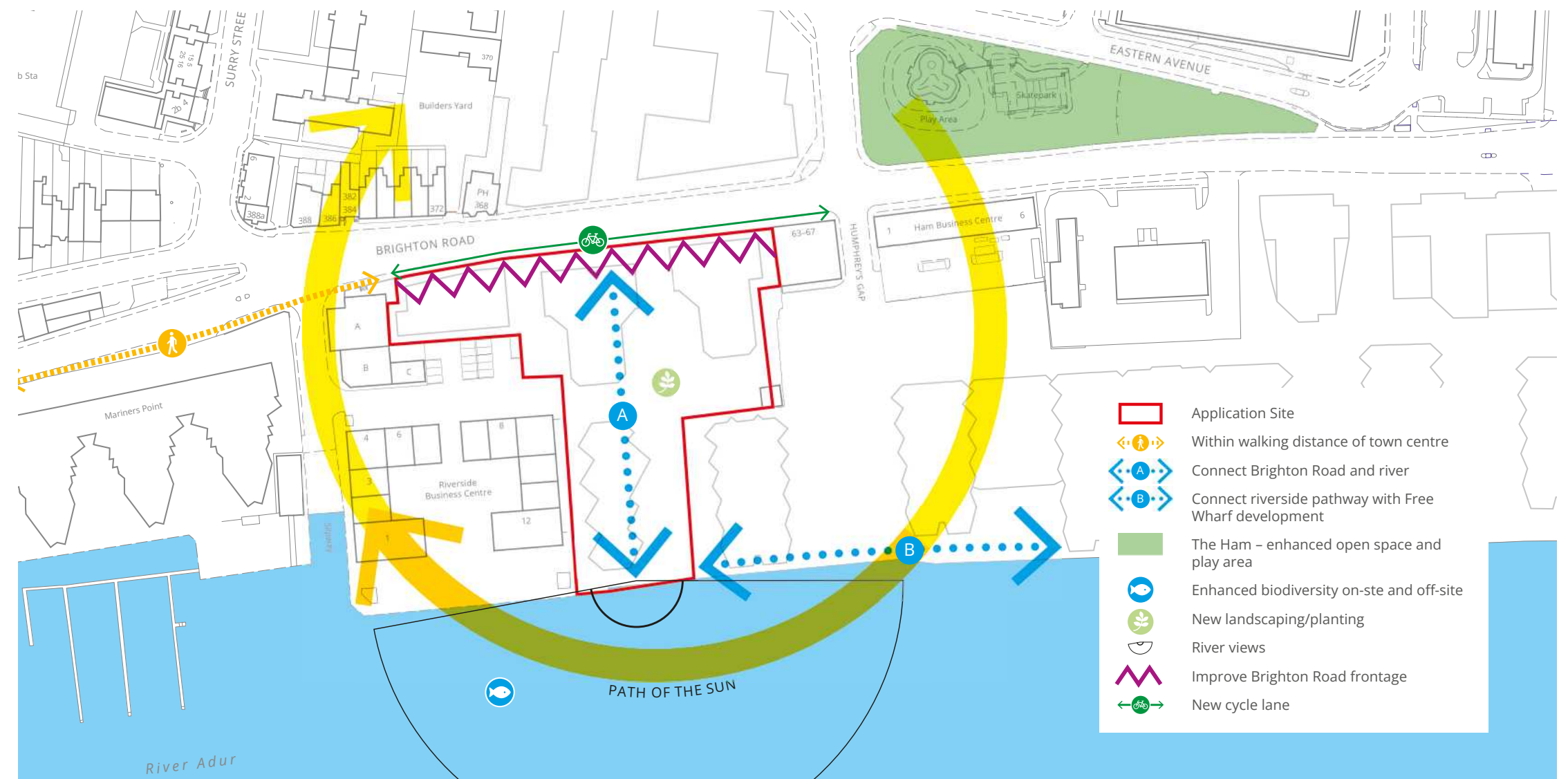
## Opportunities

5.2 The site also offers many opportunities, which new development should seek to take advantage of, as follows:

- Flood Risk – The redevelopment of this site provides an opportunity to improve flood defences both for the site and the wider area. One of the aims of the JAAP is to create new flood defences along the length of the Western Harbour Arm through the redevelopment of the various parcels of land within it. The Free Wharf development to the east will provide defences along its length, through a new river wall, and raised land within the site. The same approach will be followed for the application site, which will both make residents within the site safe from flood waters, and also bring the hard flood defences a little further to the west.
- Brighton Road Frontage – There is an opportunity to provide development on the Brighton Road frontage which will be both distinctive and attractive, and which will help to enhance the character of the area. This can provide a marked improvement, particularly when compared with the utilitarian sales and engineering buildings currently on the site's road frontage. In addition, locating a line of new buildings here can help to shield the remainder of the site from the noise and polluted air on the road, providing a more pleasant living environment for the rest of the site.
- New Public Access Routes – There is currently no right of public access through the site. However, the redevelopment of the Free Wharf site to the east will provide a new public route along the river frontage, in accordance with the policies of the JAAP. Redeveloping the application site provides an opportunity to provide a further link in this route, by allowing people to then travel through the application site, and up to Brighton Road. This will ultimately become the natural walking and cycling route between both the application site and the Free Wharf development and the town centre / railway station.
- New Landscaping – The application site is currently barren of vegetation, and in redeveloping it there is an opportunity to transform it into a far more green and attractive space. This is clearly important, both to enhance biodiversity within the site, and also to create an attractive environment for people to live within, and travel through.
- Gain in Biodiversity – The site currently has a low ecological value. The greatest area of biodiversity lies adjacent to the site, in the River Adur, and its mud flats, which are important for local birds. The site's redevelopment offers an excellent opportunity to introduce new landscape planting in native species, green roofs, and the provision of bird boxes. No works would be undertaken within the River, so as not to harm the existing habitats there, but the new river wall would be clad in timber baulking, to increase invertebrate, crustacean and algae biodiversity.
- Path of the Sun – New development within the site can be orientated to make maximum use of natural light and direct sunlight, to the benefits of people living with and using the site.
- Riverside Views – The River Adur is to the south of the site, and as with the need to maximise natural light, there would be a clear benefit in providing views over the river from the apartments, and also from within the open space within the site. This is also a requirement set out within the Shoreham Harbour JAAP. These views can help to create a pleasant living environment, and ensure that the river is fully appreciated.



Opportunities

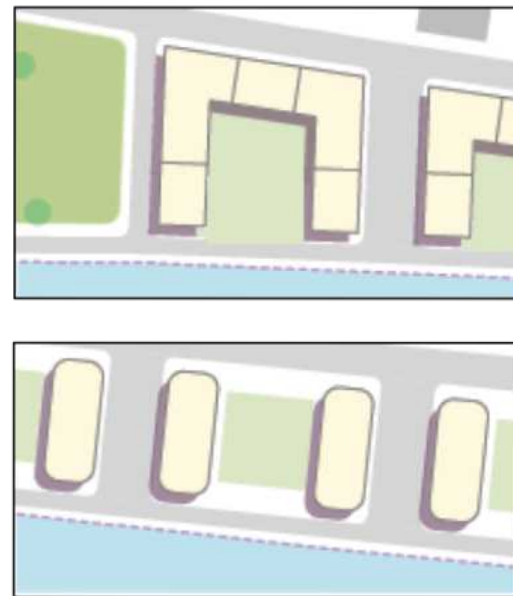




## The Council's Design Guidance

5.3 The Council's Shoreham Harbour Joint Area Action Plan (JAAP) provides a range of guidance and various requirements for planning applications within the area it covers. This is summarised below, and we consider these requirements, and the application's response to them, in the subsequent sections of this statement.

5.4 With regard to "development form and typology", paragraph 4.7.66 encourages the design of buildings to maximise views across the river. It also recommends that the orientation and shape of blocks should vary depending on the size and shape of the site in question. For deeper sites, it recommends horseshoe-shaped blocks, whilst narrower sites should accommodate north-south orientated blocks (see the adjacent images, which are taken from the JAAP).



Development typologies recommended by the JAAP.

5.5 Paragraph 4.7.67 recommends that parking and employment floorspace should be provided on lower levels, with residential accommodation in apartments above this. Policy CA7 requires the provision of active uses on the waterfront, and a setback to enable access to the waterfront by the Environment Agency's vehicles. Major waterfront developments are also required to incorporate features to improve open access to the waterfront, and boat moorings.

5.6 Policy CA7 requires development on the Brighton Road frontage to be set back sufficiently to accommodate a new segregated cycle route, and to provide green infrastructure. It also requires developers to help deliver measures set out in the Shoreham Harbour Transport Strategy, which include a new waterfront route for pedestrians, targeted junction improvements, pedestrian and cycle crossing points and bus stop improvements.

5.7 Policy CA7 also encourages the provision of landscaping within application sites, and the use of sustainable drainage features. It notes that where open space requirements cannot be met on site, financial contributions will be required towards the creation of a green corridor on Brighton Road, and/or the enhancement of existing open spaces, such as The Ham.

5.8 Paragraph 4.7.69 notes the following with regard to density and building heights:

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

5.9 Policy CA7 contains similar text, and it also states the following:

"Taller buildings may be considered in the centre of the allocation (western portion of site WH3, site WH4 and eastern portion of site WH5). Proposals will be required to demonstrate an appropriate response and high quality design in relation to the following elements:

- Scale and height
- Architectural detailing
- Materials
- Public realm and open space
- Public transport accessibility

Views into and out of the area, including assessment of glimpse views, local views and long views in relation to the waterfront, local landmarks, the South Downs National Park, conservation areas, and historic assets.

Microclimate impacts including wind, daylight and sunlight effects, air pollution and urban heat island effects."



5.10 The policy also requires new development to be built at a density of at least 100 dwellings per hectare, and for 1,100 dwellings to be provided within the Western Harbour Arm area; no upper limit is set to the number of dwellings to be provided, or the density of development.

5.11 Other than this, the JAAP's guidance on building heights refers to the Western Harbour Tall Buildings Capacity Study, which is discussed above in Section 2. There are no issues raised within the JAAP which specifically limit the height of development on the application site, as the noted issues relate to views of listed buildings, and the identified views through the centre of the Western Harbour Arm area (not the application site) towards the South Downs.

5.12 As we have explained in Section 2 above, Policy CA7 and its supporting text do not place any specific limit on the height of the buildings which can be accommodated on the application site.

Whilst reference is made to some of the other sites within the Western Harbour Arm, this is in the context of the need to limit the height of buildings in those locations, with regard to the matters discussed within the Tall Buildings Capacity Study; these constraints do not affect the application site in the way they do the other sites within the wider allocation.

5.13 Policy CA7 also requires that development to the south of Brighton Road should ensure it does not prejudice the potential future redevelopment of land to the north of the road.

5.14 Paragraph 4.7.73 notes that the Council's evidence regarding housing need indicates that the majority of the homes required are smaller dwellings, with a requirement for 35% 1-bedroom and 60% 2-bedroom properties, and only 5% with 3-bedrooms. This is discussed further in the Supporting Planning Statement.





Design and Access Statement  
Land at 69–75 Brighton Road,  
Shoreham-by-Sea

Design Concept



The initial proposals presented to the Council in April 2020.



6.1 In this section we have set out an explanation of the design process which has been followed in the preparation of the current application proposals. This incorporates lengthy pre-application discussions with the Council, and an independent Design Review process, which were undertaken virtually through the covid-19 lockdowns. More recently there have been further discussions with the Council, and a series of public consultation events with the local community. Finally, the proposals have been revised in light of the refusal of an initial planning application by the Council's Planning Committee, on the basis of the scale of the tallest buildings within the site.

### Initial Discussions with Adur District Council

#### March 2020

6.2 We initially began discussions with the Council's Head of Planning in March 2020. To begin with, this concerned matters of principle with regard to the design of the site, including matters set out within the JAAP, and the context within which the application proposals would come forward. One matter highlighted in particular was that any new development on the application site would need to be designed with careful regard for the effect it would have on the scope to redevelop the adjacent land at the Riverside Business Centre in the future; the Council were keen that this should be possible, so that any new development would be able to complete the flood defences in that area. We were also made aware of the emerging proposals for the redevelopment of the former Civic Centre site, to the north, with initial proposals having presented an eleven-storey element on Brighton Road (this is shown in the various 3D visuals below as a white box-like shape).

#### April 2020

6.3 We discussed the emerging design with the Head of Planning in April 2020. The images presented at this early stage were informed by an internal design process, which had followed the principles outlined in Section 5 above, as well as our earlier discussions with the Council. The drawings included a notional development on the adjacent Riverside Business Centre, shown on both the site plan and 3D images. This showed an L-shaped building, positioned so as to make efficient use of the site, and to partially enclose a south-facing open space. This was positioned in a way which was intended to allow appropriate separation from the blocks proposed on the application site, and also an open space which would benefit from views of the river, and natural light from the south.

6.4 The Head of Planning provided feedback, having first discussed the proposals with other Officers within the Council prior to our meeting. He commented as follows:

- The height of the buildings on Brighton Road were acceptable in principle, being five storeys along the frontage, and stepping up behind this, in accordance with the policies of the JAAP.
- Whilst some concern was expressed regarding the overall height and density of the proposals, this was also balanced with an understanding that financial viability would be difficult to achieve, following similar issues on the adjacent Free Wharf site. This would be affected by matters such as the provision of new flood defences and ground remediation. Willingness was expressed to consider ways in which the amount of accommodation could be maximised in the most appropriate way.



Design and Access Statement  
Land at 69–75 Brighton Road,  
Shoreham-by-Sea

Design Development



Proposals presented to the Council in May 2020.



- There should be more gaps in the buildings on the Brighton Road frontage, and they should be stepped back from the road, to allow more natural light to reach the street, and reduce the potential for wind to be tunnelled along the street, and also to avoid poor air quality on what is a busy road.
- Additional space was also required on Brighton Road, to allow for the provision of a wider road and new cycle path, in accordance with plans being promoted by the County Council, in their role as the Highway Authority. It was also questioned whether there was space to accommodate trees within the street.
- There was a need for more public open space within the site, and more landscaping instead of hard surfaces. It was suggested that the level of car parking proposed could be reduced to allow for more open space, although this would need to be considered in light of the need for parking.
- One of the main concerns regarding higher density development related to the greater impact on the local road network of more people in this area.
- A concern was also raised about the space between the block at the southern side of the site and Block A of the Free Wharf development, with a requirement that the window-to-window distance must be at least 28m.
- The proposed commercial accommodation could include a mix of retail, cafés and serviced offices. Encouragement was given for the inclusion of a commercial (possibly café) unit on the river frontage.
- The river wall within the site would need to be upgraded, and flood defences provided for the development.
- A connection would need to be provided to the District Heating Network which the District Council are promoting.

May 2020

6.5 Further pre-application discussions were held in May 2020, again with the Council’s Head of Planning. The proposed development had been amended in various ways, most notably with a break in the block on the Brighton Road frontage, this having been one of the most important issues raised in the initial discussions. The Head of Planning responded with the following points:

- The break in the Brighton Road frontage was welcomed.
- It was also confirmed that Officers liked the overall architectural approach and general design of the buildings.
- Concerns remained regarding the height of buildings on the Brighton Road frontage, and it was recommended that the buildings should step down in height at the western side of the site, where they are closer to the town centre and conservation area.

- There was also a need for greater articulation in their design, so as to break up their apparent mass and scale. This could include inset balconies. This was apparently in light of concerns raised by local people to the recent Mariner’s Point development (on the former Parcel Force site), which has a long and unvaried frontage, and a bulky appearance.
- It was important to ensure that the height of the buildings would not adversely affect views of the Grade I listed St Mary de Haura Church in the town centre.
- It was accepted that reductions in the scale of the blocks fronting Brighton Road could be compensated by an increase in height within the site, so as to provide a financially viable development.
- Concerns remained regarding the need for more open space and landscaping within the site. The potential to reduce car parking was discussed, to allow for this, and whilst it was agreed that reduced parking would be helpful, it also required separate consultation with the Highway Authority.



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Proposals presented to the Council in June 2020.



## June 2020

6.6 Further revised proposals were presented to the Council in June 2020, incorporating a number of changes in response to the Council's previous comments. The blocks on the Brighton Road frontage were further broken up, with greater spaces between them. Blocks 1 and 2 had also been set further back from the road, to provide space both for a new cycle lane, and also a broader public realm. The floorspace lost through these reductions in scale were compensated with a new built link between Blocks 2 and 4. Block 1 had been redesigned, reduced in height by a storey, and provided with a slanted frontage and recessed balconies. The design of the other blocks had also been altered, with changes to their appearance and materials. Additional soft landscaping, was provided throughout the site, and it was acknowledged that further work would be required, once a landscape architect was appointed on the project.

6.7 In response, the Head of Planning provided the following comments on behalf of Officers:

- It was accepted that the proposals had responded to Officers' concerns regarding the Brighton Road frontage, and the changes in this respect were welcomed.
- It would be preferable to separate the front and back blocks, to provide greater visual separation, permeability within the site and reduce the apparent density of development.
- Concerns remained regarding the need for more open space, and also play equipment for children.
- It was highlighted that the development should be designed to allow a connection to the proposed District Heat Network.

## July 2020 – Major Projects Board

6.8 In July 2020, a presentation was made to the Council's Major Projects Board, which at that time consisted of the Head of Planning, the Executive Member for Regeneration (also the local Ward member), and the Chair of the Planning Committee. The proposals had been further amended from those considered in June, with the gap between Blocks 2 and 4 reintroduced, and this was compensated for by an increase of one storey across the whole of Block 4.

6.9 The Major Projects Board provided the following comments:

- The appearance of the buildings was praised, and it was commented that the architectural approach was preferable to that proposed by the Kingston Wharf development (which the Planning Committee had recently resolved to approve).

- Encouragement was given to the inclusion of pontoons for boat moorings within the river.
- Concern was expressed as to whether the ground floor commercial spaces could be let, as those at Mariner's Point remained vacant.

## Initial Meeting with Design South-East

6.10 The proposals presented to the Design South-East Panel members, in September 2020, were very similar to those presented to the Council's Major Projects Board, with some tweaks to the design of the buildings, additional landscaping and the addition of boat moorings.

6.11 The Panel's full comments are included in their letter, reproduced at Appendix 1 to this statement. This letter set out the following key recommendations:

1. Develop a convincing place-led proposal with a positive human experience and local distinctiveness at its root.

2. Produce a comprehensive landscape and public realm strategy, the success of which is dependent upon a significant reduction in the amount of parking.
3. Consider the overall redline boundary and demonstrate a considered and appropriate integration with the existing and emerging context. Distinction of the public and private realm should be achieved.
4. Clarify how the form, height, mass and architectural response is responsive to neighbouring developments and support with detailed studies.
5. Refine and simplify the housing layouts, form, mass and architecture to prioritise user experience.
6. Demonstrate how the development creates a positive human experience at eye-level at the ground and how key pedestrian and cycle movements are supported and complemented on associated frontages.



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Proposals presented to the Council's Major  
Projects Board in July 2020.



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Proposals presented to the first meeting with  
Design South-East, in September 2020.



6.12 One of the strongest messages from the Panel members was the need to change the approach to the design of the open space within the site, and to reduce the amount of car parking. The Panel's feedback letter had suggested that the site was too dominated by car parking, and cited there being 140 parking spaces within the site; whilst only 66 spaces were in fact shown, the message was nevertheless clear that their positioning within the site had the effect of making parking and turning areas far too dominant in relation to the site's character. The Panel also commented on the need to give far more consideration to the experience of pedestrians travelling through the site. As noted above, the design team did not at this stage include a landscape architect, and Allen Pyke Associates were appointed shortly thereafter.

6.13 Another strong message related to the way the site would interact with its surroundings. This concerned both the way that flood risk would be mitigated, and also to the way the site's boundaries would be treated. It was a matter which had not until now received proper

consideration by the design team, and suitable consultants were subsequently appointed to advise on these matters.

6.14 The Panel also suggested a need to reduce the footprint of the buildings, to provide more open space. This was not possible, due to the amount of development required to provide a financially viable development. They also criticised the provision of north-facing single-aspect apartments, but again this was a necessary feature of a design on this site (as noted in Section 5 above).

### Design Development

6.15 Following the meeting with Design South-East, the expanded design team continued to develop the design, throughout the period between September 2020 and February 2021. These discussions at first focussed on the question of how both flood defences could be incorporated into the design, and a far greater amount of public open space could be provided.

6.16 Advice on flood risk and drainage issues was provided by Stantec, who also engaged the District Council's Drainage Officers, the Environment Agency and other key stakeholders in pre-application discussions. In order to provide effective flood defences, it was necessary to provide a continuous built barrier at a level of 5.6m AOD (above ordnance datum, effectively meaning the distance above sea level). The ground level within and around the site is around 4m AOD at the site's Brighton Road frontage, and 4.4m AOD at the river frontage. This meant that there was either a need for a hard barrier around the site, or the level of the ground needed to be raised by between 1.6 and 1.2m. It was also necessary to consider the provision of an emergency egress route at 5.6m AOD or higher, to allow people to escape from the site in a flood event.

6.17 At the same time, options were considered to reduce the effect which parked cars would have on the environment within the site. The initial design options shown opposite illustrate how consideration was given to

alternative approaches. Option 1 shows how the ground levels, within what was then the most recent site layout, would need to be adapted to provide a safe egress route at 5.6m AOD. This would mean that the site would be subject to a number of steep changes in level. Upon entering the site from Brighton Road, the ground would rise from 4m to 5.6m AOD. A safe egress route would also be provided through the centre of the site, and to a point at the southern boundary, where safe egress could be provided to the Free Wharf site (following its redevelopment). However, there would be a need for a steep reduction in levels to access the car parking areas beneath Blocks 3 and 4.

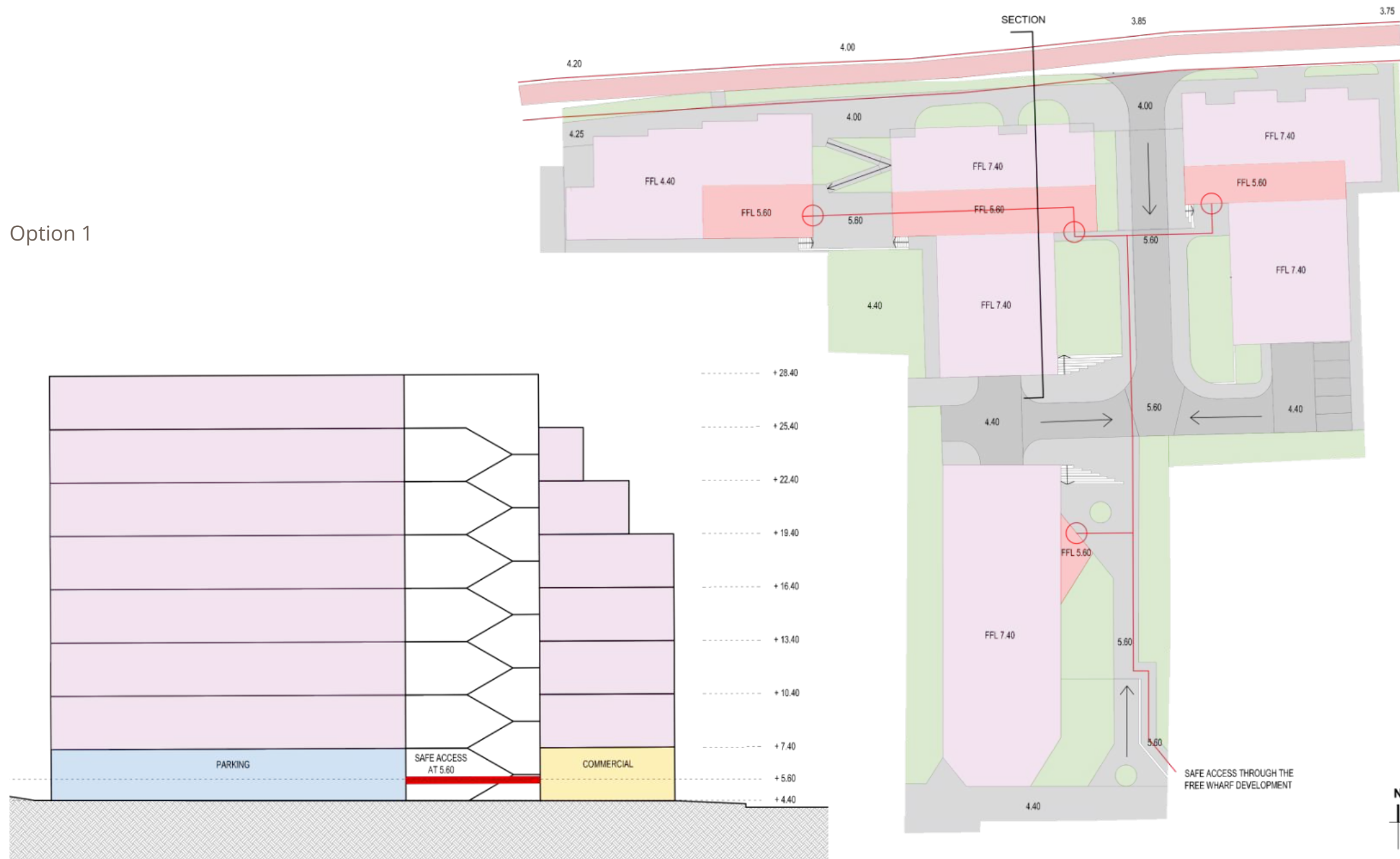
6.18 Option 2 shows an alternative approach, with split levels, accessed from parallel points adjacent to Brighton Road. Pedestrians and vehicles would diverge as they entered the site between Blocks 2 and 3, with vehicles heading down to an underground car park, whilst pedestrians would travel uphill into the site, to an area at 5.6m AOD.

6.19 Option 2 provided clear benefits over Option 1, in that it allowed for the creation of a public realm which would be largely free of vehicles, and also potentially for more space for car parking. But this approach also presented numerous challenges, such as how to provide a safe highway access which prevented conflicts between vehicles and pedestrians, and it would also be far more expensive to build.

6.20 The potential for conflicts between pedestrians and vehicles was resolved by a further change to the proposed design, which incorporated a separate vehicular access to the underground car park between Blocks 1 and 2, leaving the space between Blocks 2 and 3 free for a pedestrian entrance. This also had the clear advantage of greatly improving the experience for pedestrians, by removing parked cars from the route through the site. As we have noted above, this route had already been identified as a key benefit which the site's development could offer, linking the riverside walk with Brighton Road, in a natural desire line for people walking and cycling to the town centre and station.



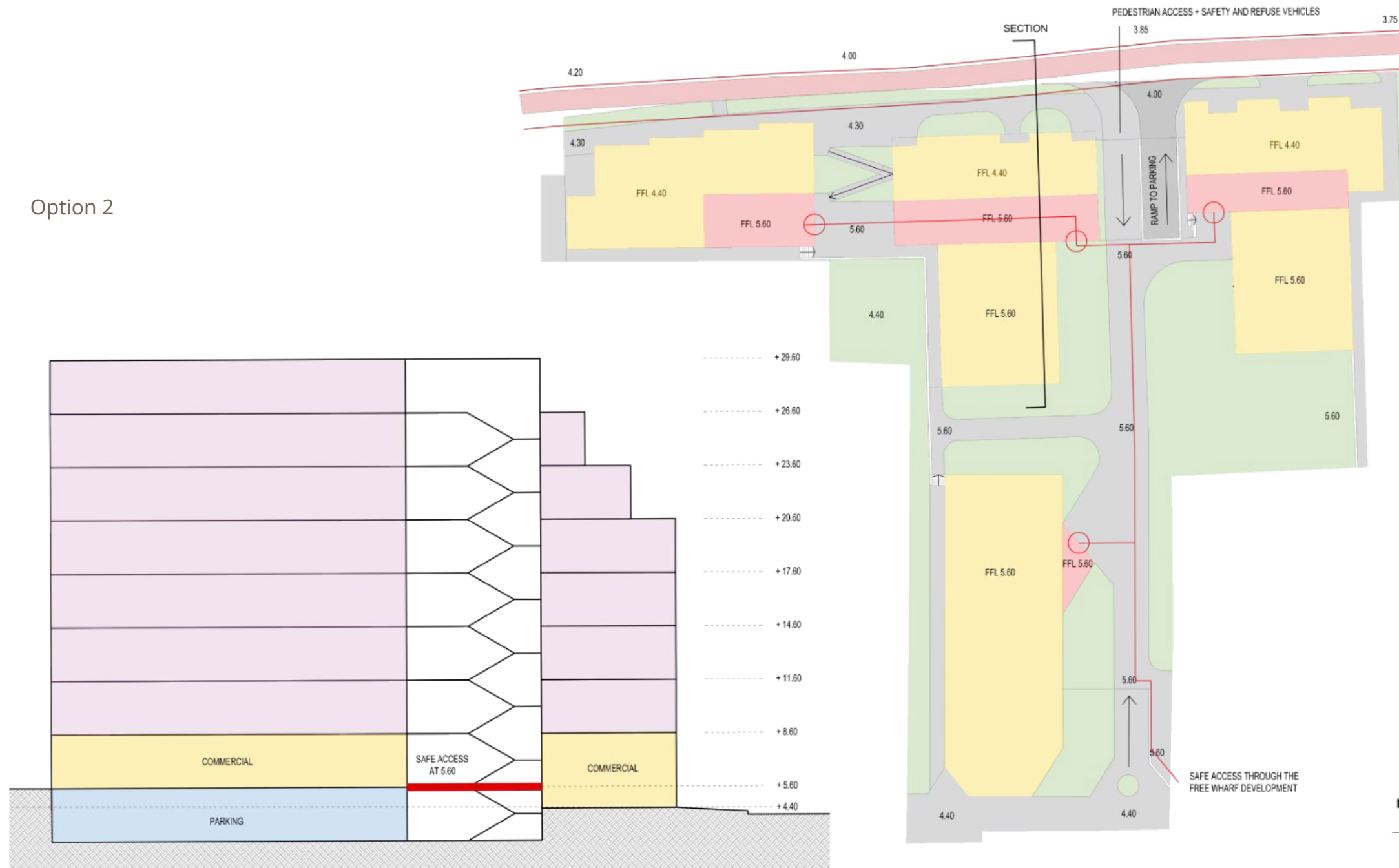
Option 1



The initial design concepts put forward by the Architects and considered in the formulation of the approach to incorporating flood defences and greater public open space within the proposed development.

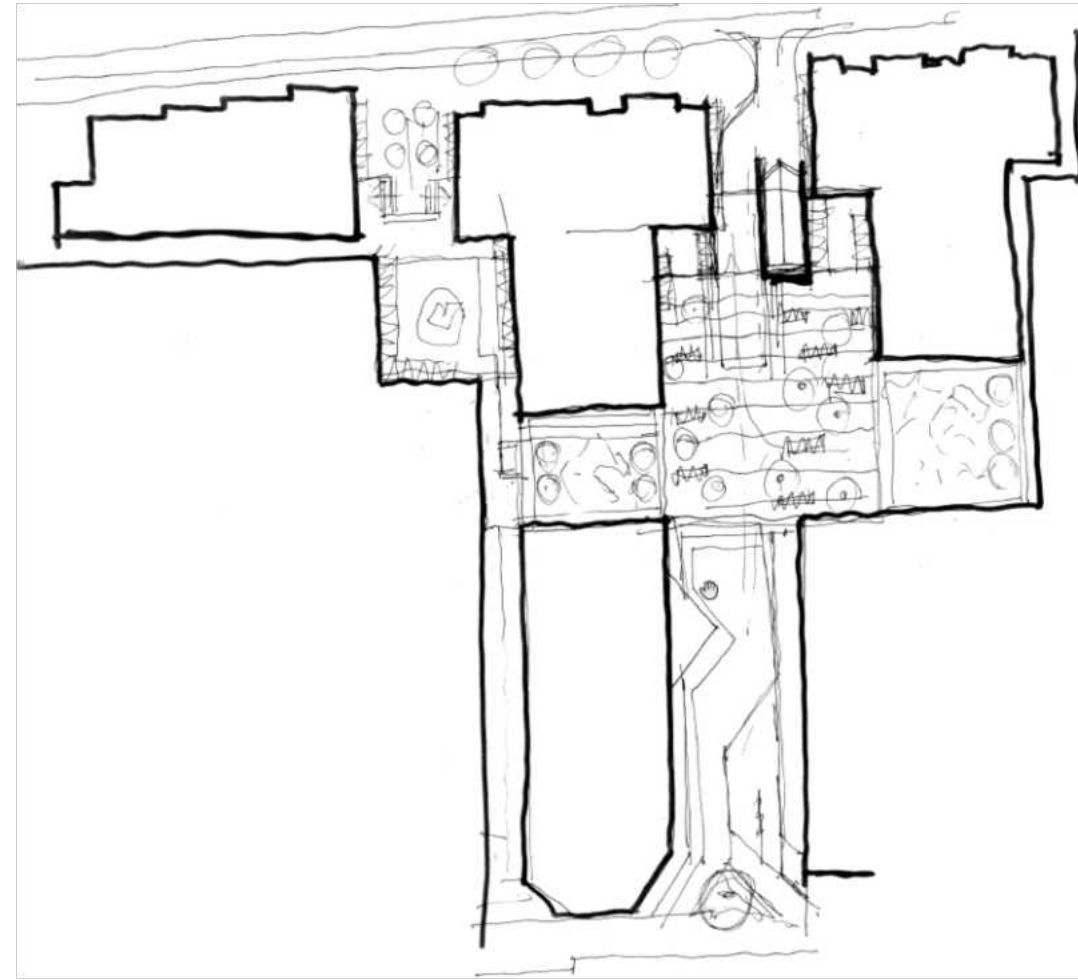
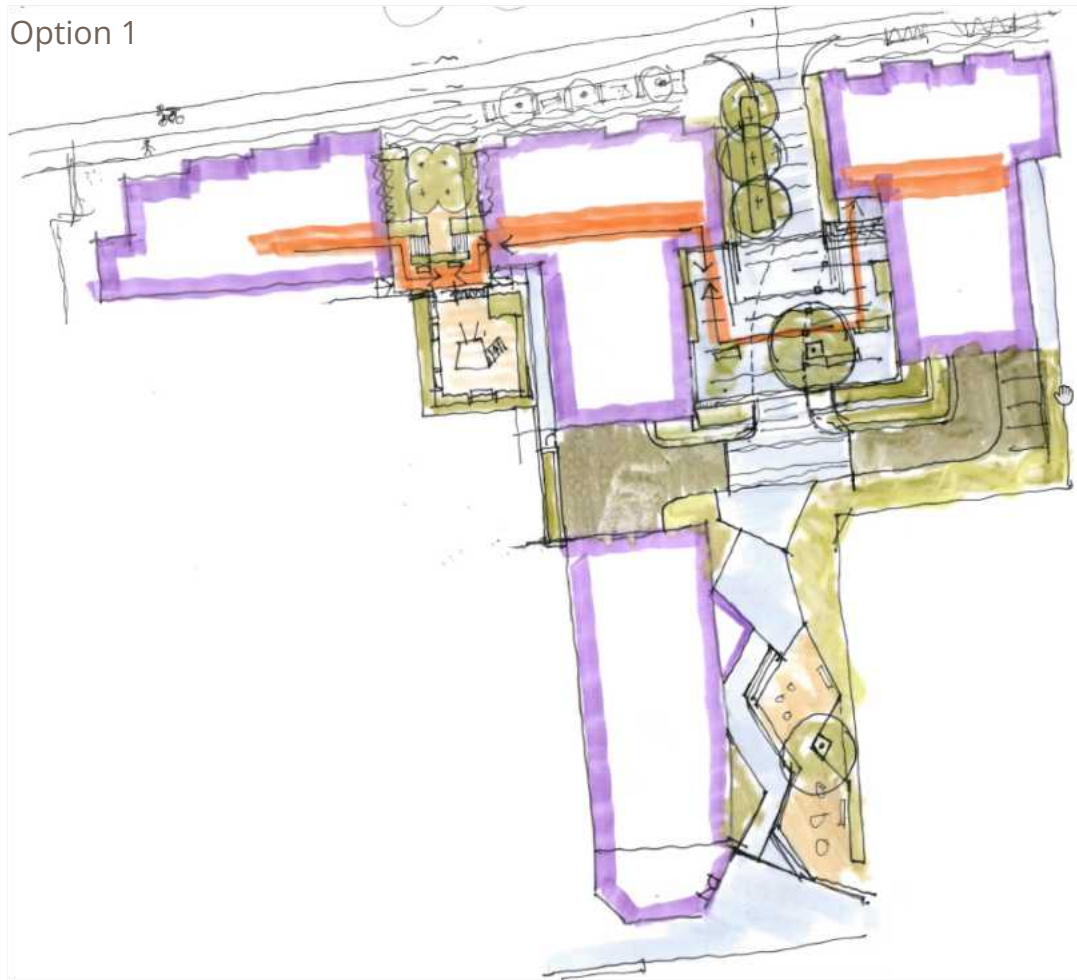


Option 2

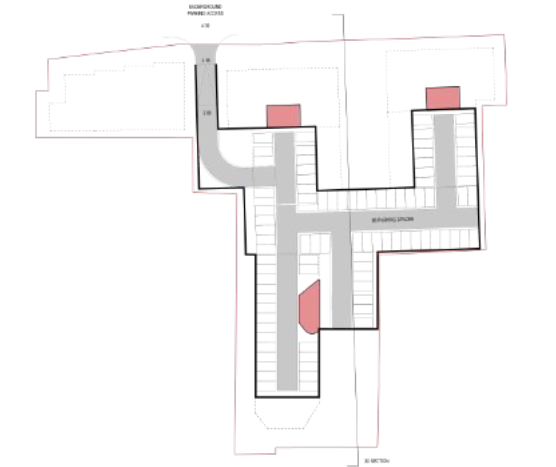




Option 1



3D section illustrating basement concept and levels.



Initial design for underground car park layout.

Initial concept sketches for the landscape layout  
with options 1 and 2.





Emerging proposal for the landscape design.

6.21 In parallel with these developments, the proposals for the public realm within the site were further developed, with the process led by Allen Pyke Associates, the landscape architects who had also worked on the proposals for the adjacent Free Wharf site. The approach which was taken in the design of the open spaces within the site is set out in more detail within the Landscape Strategy, which accompanies this application. In summary, proposals were developed which sought to provide the following:

- A range of inter-connected spaces with different characters, which would serve the needs of different people, including an equipped childrens' play area, and different areas of seating.
- The proposals were to be focussed on meeting pedestrians' needs, although they also needed to allow access for the Environment Agency's maintenance vehicles to the river frontage, and for fire tenders and ambulances to access Building 4 in the case of an emergency.
- Green infrastructure was to be incorporated as an essential element of

the design, to provide a verdant environment, and help to enhance the site's value to local wildlife.

- It was also proposed to include references to the site's history within the proposals, to help create a distinctive sense of place which related directly to this site. For instance, monolithic timbers would be used for seating, referring back to the site's former use as timber pools, and bespoke works of public art would be included which would also draw on local heritage.

6.22 The proposals relied upon the provision of car parking below the level suggested by the County Council's car parking standards. This matter was addressed in pre-application discussions between Stantec and the Highway Authority. It was agreed that the proposed lower level of parking proposed was acceptable, given the site's location close to the town centre and public transport routes, and the potential to reduce the need for car ownership through other measures such as car clubs. This is discussed further in Section 8 below.



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<p><b>Second Meeting with Design South-East</b></p> <p>6.23 A second meeting was held with Design South-East, in early March 2021. Images from the presentation are included opposite. The proposals had changed substantially from those presented 6 months earlier, particularly with regard to the pedestrian experience in travelling through the site, and the strategy for addressing flood risk, as outlined below.</p> <p>6.24 The Design Review Panel’s response letter is included below at Appendix 2. The key recommendations set out within the letter are as follows:</p> <p>1. Develop a more convincing response to the potential future character of the Western Harbour Arm in line with the Area Action Plan (AAP) that prioritises a positive human experience and local distinctiveness.</p> <p>2. Clarify and develop how the form, height and mass are considered as a coherent architectural response to the nearby context through studies of near and mid-range views.</p>	<p>3. Re-consider the figure ground of the buildings, the balance between building and landscape and simplify the form, mass and architectural language.</p> <p>4. Further develop the landscape and public realm strategy, in dialogue with the architectural strategy, to make the limited amount of space work to the best advantage of the scheme.</p> <p>5. Change the housing layouts to reduce the number of single-aspect and north-facing homes and provide more generous balconies so as to increase the liveability and quality of the homes provided.</p> <p>6. Demonstrate how the development creates a positive human experience at eye-level.</p>	<p>message than had been received at the first meeting. Nevertheless, the design team recognised that there was a lot of useful advice in the feedback received, and further work was undertaken over the following two months to respond to the Panel’s comments wherever possible.</p>
	<p>6.25 Whilst the Design Review Panel had included seven members at the first meeting, there were only three Panel members present at the second meeting. This led to some frustration on behalf of the design team, as the views of a small number of people, and particularly one Panel member who made the majority of the comments, led to a less balanced</p>	<p>6.26 We also discussed the Panel’s comments with District Council Officers, who shared some of our reservations. The table below sets out the design team’s response to the various comments in the Panel’s letter. This table sets out both the views of the design team and also the Panel’s comments, and also highlights where the proposed design has been further amended to respond to these.</p>



TVIA View 6 Wireline of proposals



## Design Development



## Waller Planning

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1	Develop a more convincing response to the potential future character of the Western Harbour Arm in line with the Area Action Plan (AAP) that prioritises a positive human experience and local distinctiveness.	<p>The proposals have been designed to fit in with the context formed by the approved development to the east at Free Wharf, and the proposals for the Civic Centre site, to the north. The design of the buildings has however been further modified, to respond to comments made by the DRP and the Council, and also to reflect to a greater degree the design of the other buildings proposed nearby.</p> <p>The Landscape Strategy sets out how local distinctiveness will be embedded within the proposals for the public realm, with reference to the site's history, and local heritage. Further details will be provided in the future, in response to planning conditions requiring details of matters such as public art.</p>
2	Clarify and develop how the form, height and mass are considered as a coherent architectural response to the nearby context through studies of near and mid-range views.	<p>Views of the proposed development produced for the Townscape and Visual Impact Assessment (TVIA) show the proposed development in the context of its future surroundings. The proposed development has also been designed to respond to the planning policy context provided by the Shoreham Harbour JAAP.</p> <p>The DRP agreed at the meeting that the initial TVIA views demonstrated that the proposals would fit in with the context formed by the new development on the adjacent land, as seen in longer-distance views. We consider that the proposals would fit in equally well with their context, when seen in near and mid-range views. and this will be demonstrated by the wireline massing views as part of the submission.</p> <p>In terms of finishes to the buildings, the appreciation of this in near and selected middle distance views will be demonstrated by fully rendered verified views which will support the TVIA, alongside the further visualisations and design rationale produced by Bryant and Moore Architects.</p>

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3	Re-consider the figure ground of the buildings, the balance between building and landscape and simplify the form, mass and architectural language.	<p>The DRP made one suggestion relating to a change to the footprint of the buildings, that of merging Buildings 1 and 2; as set out in relation to point H below, both the Applicants and the Council consider that this would be a retrograde step, for a number of reasons.</p> <p>We consider that the series of spaces which would be provided between and around the buildings would be of a high quality, and that they would also be highly functional. Making these spaces a different shape, or slightly larger, would not have any substantial effect on the way that they would operate, or feel. However it would have a substantial effect on the amount of accommodation which could be provided, and so adversely affect the development's financial viability.</p>
4	Further develop the landscape and public realm strategy, in dialogue with the architectural strategy, to make the limited amount of space work to the best advantage of the scheme.	<p>The design of the buildings, landscape and public realm have been further developed, with the aim of making them more closely related and cohesive. Further details are provided below.</p>
5	Change the housing layouts to reduce the number of single-aspect and north-facing homes and provide more generous balconies so as to increase the liveability and quality of the homes provided.	<p>It is not possible to reduce the number of north-facing apartments, without greatly reducing the total number of apartments. This would render the proposed development financially unviable.</p> <p>The proposed balconies have been made larger, and provided with additional shade from the sun and wind, to make them more useable amenity spaces. We also note that all residents would also have access to a range of outdoor spaces, including roof gardens and spaces within and close to the site.</p>



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6	Demonstrate how the development creates a positive human experience at eye-level.	At the time of the DRP meeting, the images of the proposed development at eye level had only recently been produced, and they were still in need for refinement. They have been further developed since that time, and better aligned with the Landscape Strategy, which has itself also been further refined. A series of images have now been provided, which clearly illustrate how the development would appear to people walking through the site. We consider that these demonstrate that the various spaces and different character areas within the site would be attractive, and
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Relationship to the existing and emerging context

A	The scheme's character needs to be made more distinctive and complementary to emerging and newly built schemes.	<p>The design of the buildings was already based in part on proposals for other nearby sites, including the approved development at Free Wharf and the emerging proposals for the Civic Centre site. However, the design of the proposed buildings has been amended further to be more complementary of those proposed at Free Wharf, in relation to the Brighton Road frontage and riverside frontage respectively.</p> <p>The buildings have been designed to have their own character, in close consultation with the Council and in light of their experience from other nearby developments.</p> <p>The landscaped spaces within the site have been designed to be both interesting and to offer different character areas (praised elsewhere in the DRP letter). They also offer consistency, and would be integrated with the neighbouring development at Free Wharf.</p>
B	More work is needed to develop the form, height, mass and architectural response in the local context of neighbouring developments, including visualisations of near and mid-range views. The architecture should be described in three-dimensional, spatial terms, using physical and digital 3D models that include this context. Elevations and materials should develop the narrative being created by other schemes in the vicinity.	<p>The DRP letter accepts that the proposed development is acceptable in longer distance views, and that the issue relates to near and mid-range views. The subsequent paragraph in the DRP letter suggests that this is due to a lack of views from pedestrian vantage points in these closer views. This is addressed in the application documents.</p> <p>The proposed development is shown in many new 3D views, using sketchup and similar software. The TVIA also incorporates verified views, which can be replicated by third parties if required.</p> <p>We cannot see any merit in providing a physical model, particularly when the application proposals will be experienced electronically by the vast majority of people who view them.</p>

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C	The red-line application boundary encloses an awkward shape for development that constrains the plan, form and massing. This could be helped by integrating the redevelopment of the Riverside Business Centre with this site.	The Applicant has tried to explore this option, but the land is in a separate ownership, and it is simply not possible to bring forward proposals relating to both areas of land together at this time. There is also no planning requirement for development to be brought forward on both sites together, and it is worth noting that the Riverside Business Centre is outside of the area covered by the Shoreham Harbour JAAP, suggesting that the Council have not envisaged the sites being developed together in their strategic planning of the area.
D	We commend the dialogue established with the owners to the east. The opportunity to collaborate on boundary conditions could improve east-west permeability and make the most efficient use of land. The unfortunate image shown of a railing between landownership and two separated strips of land will, we hope, be superseded soon by shared areas, maybe under joint management.	As we explained during the meeting with the DRP, the Applicant has held extensive discussions with the developer of the Free Wharf site. Thanks to this, both the current application proposals, and that developer's future intentions have been aligned, to ensure that the two sites would be suitably inter-connected, within a seamless public realm. This will include footpath connections, and landscaping continuing across the two sites (designed by the same Landscape Consultants, Allen Pyke Associates), and no obvious visible boundary between the sites.
E	The permeability of the scheme north-south, forming a clearly public connection between the Brighton Road and the River Adur, is a public benefit.	Noted. The proposed design has always sought to provide this connection, and great efforts have been made to make it an attractive environment, particularly for pedestrians.

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F	The clarity and legibility of the blocks and how they sit together is the key issue, not height per se.	The design of the proposed blocks has been further considered in light of the DRP's comments. Their entrances have been made more easily legible, both through changes to the buildings and the landscape which surrounds them. The landscape has also been designed with care, to ensure that it would lead people through the site, and through to different character areas within the site.
G	The balance of built form to open space was questioned at the first review: this has not been developed and remains a significant cause of concern. Smaller building footprints would facilitate wider and more light-filled external spaces that can be of a higher quality and provide a wider range of recreational functions. The ratio of building footprint to the width of spaces is high and gives rise to uncomfortable spaces in terms of shading and microclimatic conditions. We did not see detailed study of these factors.	<p>It has not been possible to reduce the size of the buildings, as suggested by the DRP, as this would compromise the financial viability of the project as a whole (as acknowledged elsewhere in the DRP letter). Since the first DRP meeting, the build cost has increased substantially, due for instance to the introduction of the basement car parking and changes to the proposed materials. The buildings have not become any larger in this process.</p> <p>The width of spaces between the buildings is similar to that which has been approved on the adjacent Free Wharf site (a design held up by the DRP at the first meeting as an example of good design), and analysis of this is provided in both the Design and Access Statement and the Landscape Strategy which accompany the application.</p> <p>We consider that the DRP has greatly underestimated the quality of the spaces which would be provided within the site (see point O below). Members of the Panel commented for instance that the play area would be tucked away in a dark corner, but it would in fact have open views to the east and west, and be on the main route through the site. It may be that the above-mentioned lack of images detailing the walking route through the site has influenced this comment.</p>

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H	A reduction in quantum would help, though we acknowledge this could compromise viability. Three blocks, not four, would enable a scheme with better open space. It might be worth, for instance, exploring moving block 2 to the west to meet block 1 that would create a more generous and welcoming landscape space in the centre of the site. The impact of a longer elevation on Brighton Road would need to be tested (though this would not be as long as it was in the first iteration in March 2020, as shown in the last DRP). We acknowledge that this would result in the loss of the lawn currently located between blocks 1 and 2. However, we feel that this would not be pleasant to be in and that better space could be provided elsewhere.	<p>This option was presented as an “off the top of the head” concept by one member of the DRP at the meeting, and not commented on by other members. As we explained in the meeting, this is an option which was explored at the beginning of the design process, and discounted following discussions with the Council. We are surprised to see this in the final letter.</p> <p>Such an approach would have an adverse impact on conditions for pedestrians on Brighton Road, by reducing natural light on the street, tunnelling wind, and trapped air pollution. It would create a more oppressive environment for pedestrians and cyclists. The Council has resolved to ensure there are gaps between blocks, following reflection on the design of the new building on the former Parcelforce site, to the west of the application site.</p>
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I	<p>A more refined, simpler plan with fewer setbacks should be brought forward. This would help with overall coherence and appearance. The treatment of upper levels on the Brighton Road could be revisited. We do not agree that it is necessary to be less conspicuous on the skyline. The set-backs could be made part of the building, giving a cleaner, less fussy form. The road frontage should have more continuity and consistency of materials and form. The elevations should have a similar language on the front and sides on Brighton Road.</p> <p>We favour a simpler and clearer palette of materials; the scheme may be trying too hard in this regard at present and in doing so reducing its architectural quality. Grey metal with brick is not a good in combination (it would need a lot of maintenance). We hope to see 'real' brick, not panels. Brick fits with the local context.</p>	<p>The materials proposed for Block 4 have been amended, to make it more clearly distinct from the group formed by Blocks 1, 2 and 3 on the Brighton Road frontage. Lighter colours have been used, to better reflect the colours which are now likely to be used on the riverside buildings within the adjacent Free Wharf development.</p> <p>The design of Block 4 has however always been distinct from that of the other blocks, following as it does the offset balcony design used in other nearby developments at Free wharf and the former Parcelforce site (as inspired by the Origami Building in France, noted elsewhere in the Design and Access Statement).</p>
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J	<p>While blocks 1, 2 and 3 should form a group and accept the discipline of height and scale in the AAP, block 4 could be more distinct with an interesting form and elevations of its own.</p>	<p>The materials proposed for Block 4 have been amended, to make it more clearly distinct from the group formed by Blocks 1, 2 and 3 on the Brighton Road frontage. Lighter colours have been used, to better reflect the colours which are now likely to be used on the riverside buildings within the adjacent Free Wharf development.</p> <p>The design of Block 4 has however always been distinct from that of the other blocks, following as it does the offset balcony design used in other nearby developments at Free wharf and the former Parcelforce site (as inspired by the Origami Building in France, noted elsewhere in the Design and Access Statement).</p>
K	<p>The building form and mass should be reviewed in tandem with improved internal layouts for better liveability. There are too many north-facing, single aspect homes and the tight internal corridors with no natural light would not be welcoming. The typical floor plate of block 4 especially calls for rationalisation; the entrance to this block is awkward and could be improved. The combination of better-quality homes and a more efficient internal layout to Block 4 could enhance viability.</p> <p>There should be more cross ventilation. Opportunities for high-level glazing can help both ventilation and amenity, while avoiding overlooking.</p>	<p>It has not been possible to omit north-facing apartments, as to do so would greatly reduce the number of apartments which could be provided in Blocks 1, 2 and 3, and would lead to the development being financially unviable. However, additional windows have been added on side elevations, with measures to avoid overlooking where necessary, such as obscured glazing and their location at a high level.</p> <p>The floor plate of Block 4 has been designed with care, both to allow the apartments to look out towards the river (enhancing values and improving viability), and also to avoid overlooking apartments on the Free Wharf site, and future potential development on the Riverside Business Park site.</p> <p>The design of Block 4 also creates greater visual interest than would be the case with a more rectangular building, and both helps it to fit in with the character of other nearby riverside blocks, and to have a distinct appearance from Blocks 1, 2 and 3 (see point J above).</p>

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L	Some balconies are too small to be useful. The angled balconies on the road frontage in particular may prove to have little worth. Bearing in mind typical wind conditions in this exposed location, we would suggest more balconies are inset. Generally, we would encourage more consideration of views out from habitable rooms.	<p>The angled balconies on Block 1 were designed in response to a request from the Council, to inset them within the building, whilst also setting the building further back from the road, reducing its height, and provide greater variety in its design when compared with the other blocks. It is acknowledged that this initially led to them being smaller than other balconies, and the design has been amended to increase their depth.</p> <p>All of the balconies on the Brighton Road frontage are partially inset, offering a balance between shelter from wind, and a good view out into the street.</p>
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Landscape and public realm strategy

M	The panel sees a good start with the landscape and public realm strategy. We support the approach to creating character areas. Nonetheless, the landscape and buildings need to be more clearly integrated. The landscape proposal should inform the surrounding building character, form, massing and layout of the development. There are further ways the strategy could be strengthened.	As noted above under point F, the design of the buildings and the landscape have been considered further together, and amendments have been made to each to ensure they are better integrated.
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Design Review  
Panel Comments

Applicant's Response

Landscape and public realm strategy

N	The riverfront setting is the great asset of the scheme and the spatial quality of this part of the proposal should be described in detail. The waterfront would benefit from a variety of experiences for those walking and cycling along the river: this scheme could add to an interesting rhythm, variety and attractiveness on the route.	The proposals have been conceived from the outset with the intention that they would provide a seamless link to the new riverside walkway, which would link to the new public route through the site. The application proposals explain the way in which the public spaces within the site would benefit from different character areas, and what the experience would be like for people travelling through the site.
O	The placing of communal areas and play areas for daylight and shade is important as is having them where they can bolster the vibrancy of the public realm as a whole, rather than being tucked away.	We agree with the sentiment, but disagree that the proposed communal and play areas would in any way be tucked away, as noted in our response to point G above.
P	There is scope for public art to add interest on the north-south route: possibly the harbour history could be interpreted and/or expressed in artistic form.	We agree, and explained in our presentation to the DRP that it was intended that this should be further explored. The Landscape Strategy provided to the DRP also explained how the site's history would be used to influence the detail of the proposals.



Design Review  
Panel Comments

Applicant's Response

Landscape and public realm strategy

Q	While supporting the exclusion of cars from the public realm, there will still be traffic from refuse/recycling and emergency vehicle, deliveries, taxis, picking up/dropping off etc. The shared surfaces must be designed primarily for pedestrian access and amenity. Similarly, the routes for cycles need to be designed to minimise conflict with pedestrians, not least as cyclists arrive at the riverfront.	<p>It is not possible to avoid the need for vehicles to reach Building 4, for instance for the purposes of maintenance or in emergencies such as a fire. It is also desirable for convenience in some instances. However, wherever possible vehicles will be routed through the basement parking area.</p> <p>The above-ground space within the site has been designed to ensure that pedestrians would have the priority. Vehicles will only have access to some parts of this area. It will be clear that neither cycles or vehicles have priority over pedestrians, both at the site's entrance and within the site.</p>
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Sustainability

R	Our standard guidance at planning application stage is that the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy and optimise the use of renewables in order to align with the local and national zero carbon policies and targets. This strategy should be informed by detailed modelling work informed by respected calculation methods.	The application has a clear energy strategy, which is set out within the Energy and Sustainability Statement. This explains how the development would meet all policy requirements in this regard. The buildings have been designed to allow for a future connection with the Shoreham Heat Network, and until this is available they will be served by air source heat pumps.
S	The amount of cycle parking is commendable. We also welcome the scheme's provision for car clubs.	

Third Meeting with Design South-East

6.26 Following the submission of the previous planning application, a further meeting was held with the Coastal West Sussex Design Review Panel. The purpose of the meeting was to allow the Panel to provide a commentary on the design that was proposed by the application, to inform the Council’s determination of the planning application. This meeting was held in September 2021, and Design South-East provided a written response dated 1st October 2021. A copy of this letter is included at Appendix 3 below; it contains the following summary and key recommendations:

“The applicant and design team are applauded for the presentation and engagement with the planning authority. The scheme is critical to the development of the wider area and it is imperative that it acts as a seamless piece of townscape. The landscape design will be important in unifying and integrating the proposal with its wider context, in particular the proposed north-south route. The landscape is

also a key opportunity for the scheme to present and celebrate its distinctiveness. As the scheme progresses, the design team should ensure this element of the proposal is fully resolved, whilst also considering frontages, materials palette and the internal layout.”

6.27 The report also made the following six key recommendations:

1. “Continue to develop the relationship with neighbouring properties to ensure the building and landscape design is well integrated.
2. Ensure the landscape can be realistically achieved and maintained, in particular the north-south route that is critical to the development and wider context. Details of planting and maintenance as well as visualisations at different times of the day and the year, will aid in this.
3. Ensure the landscape proposal can be realistically achieved and maintained, in particular the north-south route that is critical to the development and wider context.

4. Progress the proposals for ground floor frontages, especially on Brighton Road and the proposed north-south link, and present these to members and the public accurately and realistically.
5. Minimise single-aspect, north-facing units.
6. Progress the materials palette to ensure the scheme’s wharfside distinctiveness is celebrated.”

Changes During the Course of the Previous Application

6.28 Following this meeting with Design South-East, and ongoing discussions with Officers, the Applicants decided to make some changes to the design of the proposed buildings. The changes largely related to the buildings’ appearance, particularly their materials and the design of ground floor frontages, particularly on Brighton Road.

6.29 The original application proposals included a combination of red and buff brick colours. Following discussions with Officers, and the initial public consultation event (see below), the decision was made

to change the brick colour from red to white, to make it more like the colour of the materials used on the recent Mariner’s Point development, and that being used at Free Wharf. This change relates only to the site’s Brighton Road frontage, as the building which faces the river (Building 4) already incorporated a combination of white and buff bricks.

6.30 It was considered that this lighter brick colour would improve the appearance of the central building (Block 2) in particular; it would have a lighter appearance, which would be less obtrusive in views along the street. The white brick is also used within Block 1. In addition to echoing the materials which are being used in other nearby developments, the white brick would also be reminiscent of the white painted finishes of many buildings in the local area, including both buildings opposite the site, and all along on Brighton Road.

6.31 Changes were also made to the design of the ground floor frontages throughout the site, in response to the comments from Design South-East (above). These were previously a

continuation of the rectangular window shapes of the higher floors, but they were changed to provide a series of arches, with a recessed frontage set back behind them. This colonnaded frontage was intended to add greater visual interest to the buildings’ ground floors, and also emphasise their wharf-side appearance, in reference to the area’s commercial past; again this change was made in response to the comments from Design South-East. The theme of providing arches at ground floor level was also continued throughout the site, on all of the buildings’ frontages, to provide a consistent visual link through the site.

6.32 Cobbles were added to the recessed walls, to provide both a locally distinctive building material, and also one which would further distinguish the ground floor from the upper floors. Cobbles are used extensively in older buildings and walls within the centre of Shoreham.

6.33 Changes were also made to the alignment of the windows on Building 3, at the Brighton Road frontage, with the balconies realigned and positioned more centrally. This was a response to a change in the position of the main entrance at



## Design and Access Statement Land at 69–75 Brighton Road, Shoreham-by-Sea

## Design Development



Examples of some of the many white buildings in the local area, including the recent Mariner's Point development, and the Grade II listed buildings at 55-57 New Road, which are located just off Brighton Road near the application site.



Some of the numerous examples of cobbles inset into walls in Shoreham town centre, in the ground floor of the recent Ropetackle building, and the 12th – 14th century Grade II\* listed Marlipins Museum.



ground floor level, which was itself necessitated by the introduction of ramps (see below). Changes were also made to windows within the site, notably on the facing elevations of Blocks 2 and 4, which were intended to reduce a vertical emphasis; this change was made in response to concerns raised by Officers.

6.34 Changes were also made to the finished floor levels of the commercial units within the site. These floor levels had previously been set at around 4m AOD, this being similar to the level of the pavement on Brighton Road, so as to allow a level threshold access into these commercial units. However, the Environment Agency required that the finished floor level be raised to 4.4m AOD, to reduce the risk of these units flooding in an extreme flood event. Raising the floor levels creates a need to provide ramps to enter the building, to accommodate wheelchair users and the ambulant disabled.

6.35 The new ramps have the effect of placing the landscaping further away from the buildings, and narrowing the area within which this can be provided. However, Allen Pyke Associates have confirmed that the tree planters in this area will be of sufficient size to accommodate the proposed trees; this is facilitated by the available space, as there are few services under the site's frontage. The commercial units also became a little smaller, due to the introduction of the recessed wall behind the archways. This was considered an acceptable change, given the way that this would improve the buildings' appearance from the street.

6.36 The kerb line has also been slightly realigned, following discussions with the Highway Authority, so as to minimise the need for any future changes when the new cycle lane is built; this work will be undertaken separately by the highway Authority at a future date. This is explained further in Section 8 below.

## Public Consultation

6.37 The Applicants held a series of public consultation events to advertise the application, and seek views from local people on the changes to the proposals which were being considered.

6.38 The first consultation event was held within the application site, in the existing car showroom belonging to Frosts Cars, on Monday 16th May 2022, between 2pm and 7pm. Letters were sent to all of the people whom the Council had consulted on the application, as well as all of the people who had commented on the application at that point. This distribution list was provided by the Council's Officers, and it was agreed that it was a suitable approach, as it included those living closest to the application site, and also those who had shown a particular interest in the application. Letters were sent to 309 private addresses, and in addition also to the local Ward Councillors and other senior Members of the Council.

6.39 The exhibition was attended by 157 people. The majority of those attending were local residents, but there were also a few representatives of local businesses and elected Councillors. Attending the exhibition on behalf of the Applicants were consultants from Waller Planning, Bryant and Moore Architects, Stantec, and Allen Pyke Associates, representing a wide range of disciplines and technical expertise.

6.40 Following this, banners advertising the application and explaining the proposed development were provided within the Shoreham Centre, within the town centre, from mid-July to mid-September 2022. The Applicants and the same consultant team attended three further public exhibition events, on 4th and 31st August, and 8th September. These further events were publicised by the Council.

6.41 These further exhibitions were not as well attended as the first one, and the majority of the people who did attend had already been to the first exhibition, which suggested that the initial consultation had already reached those within the community who wished to attend an exhibition.

6.42 The Applicants and their team made notes of the issues raised in discussions at these exhibitions, in addition feedback forms were completed by attendees at the exhibition, and in comments provided by post and e-mail. A summary of the issues raised and the Applicant's response, as set out in an addendum to the Design and Access Statement for the previous application, are set out in the table at Appendix 4.



The public consultation events undertaken throughout the Spring and Summer of 2022.





The previous application proposals (top), and the current application proposals (bottom). The height of the tallest buildings has been reduced by a storey, and Block 1 has been increased in height by one storey to compensate for the loss of accommodation, to ensure the development remains financially viable, whilst still complying with the design guidance in the Shoreham Harbour JAAP.







### Key Principles

7.1 The key principles behind the design of the proposed development are as follows:

- To make an efficient use of the rare and valuable resource which the application site represents, as available brownfield land, close to the town centre, and within the Western Harbour Arm development area.
- To create a new development which would help to enhance the character of the local area, and complement that of other nearby developments.
- To provide a good quality of life for its residents, for instance with suitably sized accommodation and a variety of private and public amenity spaces.
- To provide a vibrant public realm, with a distinctive sense of place, where pedestrians would have priority.
- To ensure that the buildings and public spaces would be easily accessible to all, and to meet the needs of those with limited mobility.
- To provide new public routes through the site which would enhance connectivity within the wider area, and link well with surrounding spaces.
- To provide improvements within Brighton Road, which would enhance the quality of its environment, and enable the provision of a new cycle lane.
- To provide a notable net gain in biodiversity within the site, with rich new green infrastructure and new habitats, which connects with surrounding green spaces.
- To create a truly sustainable form of development, which would minimise carbon emissions through the design and operation of the buildings, and by prioritising sustainable modes of transport.
- To ensure that the development would be protected against threats from climate change.
- To mitigate the threat of flooding, provide a safe environment for residents, and an important part of the wider flood defences for Shoreham.

### Use and Amount

#### Residential Development

7.2 This would be a residential-led development. It would provide a total of 176 new apartments, of which 76 would have 1 bedroom, and 100 would have 2 bedrooms.

#### Commercial Development

7.3 A number of commercial units would be provided within the site, which would be within use class E. This is a new use class which incorporates a number of previous use classes, including the following:

- Retail (A1);
  - Financial and professional services (A2);
  - Cafés and restaurants (A3);
  - Offices (B1a);
  - Research and development facilities (B1b);
  - Non-residential institutions, such as education and training centres, museums, public halls, creches and health centres (D1);
  - Some assembly and leisure uses, such as gymnasiums and indoor recreational uses (D2).
- 7.4 In light of this, the commercial units will also have the potential to be placed in a number of uses. The Applicants are investigating the potential for space within the site to be used by the NHS for either primary care or other purposes, to meet established needs in the area. Alternatively, they could, for instance, accommodate offices either for a local company, or to facilitate home-working in a series of small office spaces which residents could rent. They could also include retail uses, and the units on the Brighton Road frontage would be well suited to this use. Or they could accommodate a café, a use for which the unit on the river frontage would be well suited, where it could make use of its views over the water, and location next to the public riverside walkway.

7.5 The commercial units could be used for a variety of purposes, and their use could continually change over time, responding to changes in demand. This would help to ensure that they would be well-used in future, and it reduces the likelihood that they would fall vacant. This is important, as it will help to ensure the vitality of the local area.

7.6 It is also proposed to use one of the commercial spaces in the ground floor of Block 2 for accepting deliveries to the site, for instance in relation to mail order services such as Amazon. This will remove the need for delivery drivers to enter the site to reach Block 4, and it will help to keep the central part of the site as a pedestrianised space.

Layout

Arrangement of Built Form

7.7 Buildings within the site are arranged to face the site’s Brighton Road frontage. This is necessary, in order to provide a positive façade to the public realm outside the site. Providing buildings along the street frontage also allows for them to attenuate noise caused by traffic on Brighton Road, and pollution from cars, reducing their impact on residential accommodation within the rest of the site, and making the public realm within the site a quieter, more peaceful and pleasant environment.

7.8 Within the site, the rear part of Blocks 2 and 4 would be arranged to run north-south, along the site’s length. The buildings would follow the T-shape of the site, but they would also be arranged in a way which is similar to the orientation of blocks recommended within the JAAP (see Section 5 above). This is a logical arrangement of blocks, which would allow for an efficient use of the available space. It is necessary to make efficient use of the site, both to create a financially viable

development, and also to follow Government policy, which seeks higher density development where there is a pressing need for housing, as is the case in this instance (see the Supporting Planning Statement for further details).

Access Points

7.9 The buildings would have separate access points for residential and commercial uses. Many of the commercial units would face Brighton Road, giving them the visibility required to support a commercial use, such as a shop or café. These units would be accessed directly from Brighton Road, both for their customers, and also for servicing. Servicing vehicles could park close to the frontage, in the inset parking bay in front of Block 2.

7.10 The residential accommodation within Block 1 would also be accessed from the Brighton Road frontage. The access to this building would be relatively central within the building’s frontage, and it would lead to a lobby area, from which access would be provided to all apartments.

7.11 The street-level residential access points for Blocks 2 and 3 would both be from within the pedestrianised part of the site, but close to the Brighton Road frontage. This is in part due to the need to use the street frontage for the commercial units, to give them the public presence they are likely to require to be attractive to the commercial market. However, positioning the residential entrances away from the street frontage would also allow for the creation of a more attractive entrance. There is space at this point for landscape planting, and for the separation of this pedestrianised space from vehicles, and also cycle parking for visitors. This location would also be far less affected by noise and pollution from Brighton Road. The entrances to these buildings have been carefully designed to ensure that they would be clearly legible.

7.12 Block 4 would also be accessed at street level from the pedestrianised area within the centre of the site. This is obviously necessary due to its location away from the street frontage. Its entrance would be clearly visible on the route through the site, and it would also be framed by new landscape planting, and visitor cycle parking.

7.13 Blocks 2, 3 and 4 could also be accessed from their basements; Block 1 would not have a basement. In the basement area, which would be accessed by vehicles from the entrance between Blocks 1 and 2, an area of car parking would be provided. Disabled parking spaces would be located close to the access cores for Blocks 2, 3 and 4. These cores would each contain a stairwell and two lifts. This would enable disabled people, and those with restricted mobility, to drive into the site and park close to the access, and take the lift into the building, thus minimising the distance they would have to travel between their vehicle and apartment.

Public Realm

7.14 The proposals have been built around the key principle that pedestrianised access will be provided through the site. The riverside walkway, which is to be provided through the adjacent development at Free Wharf, would be continued with a seamless connection. A new north-south route would also be provided through the site, linking the river and Brighton Road. This would form a new pedestrian route linking



the various new residential developments on the Western Harbour Arm to the town centre and railway station. It would be an attractive and interesting walking route and a far more pleasant option than the existing route, along Brighton Road.

7.15 Space has been provided for the widening of Brighton Road, using land within the Applicant's control. This would allow for the provision of a new cycle lane at the site's frontage, helping to realise a vision which has long been held by West Sussex County Council, the local Highway Authority (see Section 8 below). The site's road frontage would also be improved with new landscape planting, which is possible due to the way the buildings have been set back from the road.

7.16 The public open space within the centre of the site would be accessible to pedestrians and cyclists. Visitor cycle parking would be provided in convenient locations close to the entrances to the blocks, whilst cycle parking for residents would be within the underground parking area, so as to prevent it cluttering the public realm.

7.17 Within this public open space, pedestrians would be given priority. Part of it would also be accessible for some limited use by vehicles, for refuse collection, emergency vehicles, servicing vehicles to the commercial unit in Block 4, and for the Environment Agency's vehicles to reach the edge of the river for maintenance purposes.

7.18 Within the site, the open space would be divided in to a number of separate character areas. Details of these are set out in the Landscape Strategy document. These areas are illustrated in the Character Area Plan, which is reproduced adjacent. They would include the spaces on the Brighton Road frontage, a "central courtyard" area incorporating a childrens' play area and boules court. They would also include separate spaces such as the lawned area within the "western courtyard", and a long, sloping space leading down to the river, within the "riverfront" area. Areas of planting and seating would also be provided throughout the site. The Landscape Strategy contains far more detail on these areas, which we have not sought to repeat here.

Character Area Plan, taken from the Landscape Strategy document by Allen Pyke Associates.

- Brighton Road Streetscape
- North Courtyard
- Central Courtyard
- Riverfront
- Western Courtyard
- Amenity roof courtyards 5th and 6th floor
- Amenity roof courtyards 7th and 8th floor
- Biodiverse roofscapes



7.19 The childrens' play area would be located close to the centre of the site, so as to make it easily accessible for residents of all blocks. It would be close to the main route through the site, meaning that it would also be easily accessible to people living in the wider area. Its position would also ensure it was overlooked by a number of apartments, as well as passers-by, which would help to make it a safe space in which children could play.

7.20 The lawned area within the "western courtyard" would be a quieter space, set away from the main public thoroughfare. This would help to give it a distinctly different character to other parts of the site, and it would be a place which might for instance suit people wishing to sit on a bench in the sun, or for younger children to play on the lawn.

7.21 The main route through the site would pass through a number of different character areas, and this would help to provide interest for pedestrians, as the character of the spaces changed. Further interest would also be provided in the detail of the environment, such as through the provision of public art, and varied hard and soft landscaping.

### Relationship with the Riverside Business Centre

7.22 The Riverside Business Centre is located to the immediate south and west of the application site, which bounds it on two sides. It currently accommodates a number of different uses, including light industrial and offices. The individual units within it are dual-aspect, with windows at each end. The proposed Blocks 1 and 2 would be to the north of the Business Centre site, and they would not have any effect on direct sunlight. Block 4 would be to the east, and it would result in a reduction in natural light, mainly in the morning; however, as this would be to commercial properties, and not residential accommodation, and as these properties would all be dual-aspect, we do not consider that any effects would be unacceptable in planning terms.

7.23 As we have noted in Section 6 above, the Council have also raised the issue of whether the proposed development would limit the potential for a hypothetical future development on the Riverside Business Centre. As that land would have open southern and western aspects,



Potential design concepts for the redevelopment of the Riverside Business Centre site.

looking over the river and with no adjacent buildings in those directions, it would not be particularly constrained from the perspective of natural light. Similarly, provided that any new development on the Business Centre site were located a sensible distance from the blocks on the current application site, there is no reason to conclude that the two developments would not exist in harmony.

7.24 There would be a need to ensure that any development on the site was not too close to development on the current application site, but that is no different to the requirements faced by the current application, in relation to the approved development on the Free Wharf site, or with regard to the individual blocks within the Free wharf development. A suitable design could ensure sufficient separation between windows, and the protection of residents' privacy.

7.25 The hypothetical development options on the Riverside Business Centre site, shown in the adjacent images, demonstrates that the current application proposals would not prevent an efficient use being made of that land.

### Scale

7.26 The proposed buildings have been designed with careful regard for both local and national planning policies, and also for their context. The context formed by the site's existing surroundings, and also the nearby development on the Free Wharf site, which has planning permission, and the Civic Centre, where the Council have resolved to grant planning permission, is outlined in Section 4 above. With regard to planning policy requirements, the specific height and minimum density expectations set out within local policies, such as the JAAP and the Council's Tall Buildings Capacity Study, are outlined in Sections 2 and 5 above.

7.27 It should be noted that the proposed buildings each contain an additional element on top, which are enclosures for air source heat pumps. These would be removed once a connection is made available to the Shoreham Heat Network. The Council have advised us that they anticipate that the Heat Network will be available within



around two years of the development's construction. As such, the buildings would soon be around a storey shorter than they are shown in these drawings.

### Brighton Road Frontage

7.28 We have set out the policy requirements relating to the height and scale of buildings within the Shoreham Harbour JAAP within Sections 2 and 5 above. The JAAP envisages that buildings on Brighton Road will generally have five storey frontages, from which they will rise as they step back from the road. 1. This is the approach which the application proposals have followed.

7.29 Free Wharf is the first development within the Western Harbour Arm to be built, with the first buildings currently under construction. These buildings were approved prior to the adoption of the JAAP, and they were initially presented as having 5 storeys on the Brighton Road frontage, albeit with a double-height ground floor storey, in commercial use, effectively making those buildings closer to 6 storeys in height at their road frontage. Planning

consent has subsequently been granted for this to be converted into an additional storey of residential accommodation, meaning that the buildings are now unambiguously 6 storeys in height on their Brighton Road frontage.

7.30 As we have noted above, the Council have also resolved to grant consent for the redevelopment of the former Civic Centre site, directly opposite the application site on Brighton Road. This will involve the construction of buildings which would have 5 storeys on their frontage with Brighton Road, with a 6th storey inset slightly (by around 1.5m) from this frontage. Just behind this, and on the corner of Brighton Road and Eastern Avenue, would be a block which would rise to 9 storeys.

7.31 As such, the development which has been adjacent to Brighton Road on the sites allocated within the Local Plan is either 5 or 6 storeys high, and in the case of the former Civic Centre site, it rapidly and very visibly rises to 9 storeys in height.

7.32 The application proposals are for buildings which would have five storeys on their frontage with Brighton Road, and further storeys would be stepped back from this frontage. Of the buildings facing Brighton Road, Block 1 would have a further single storey above the 5-storey façade, which would be set back from the frontage; Blocks 2 and 3 would have 2 additional storeys above the 5-storey street frontage. This would accord with the guidance in the JAAP. The step-back from the frontage would be notably greater than is proposed on the former Civic Centre site, at 4m. Due to this greater set-back, the way in which the buildings would step up would not be apparent from all angles within the street, as only the buildings' immediate frontage would be visible when viewed from the pavement in front of them, and the buildings would appear to have five storeys.



Verified view of the proposed development, with the proposed Civic Centre development shown as a block form on the land opposite.



Verified view of the proposed development, with the proposed Civic Centre and Free Wharf developments shown in block form.

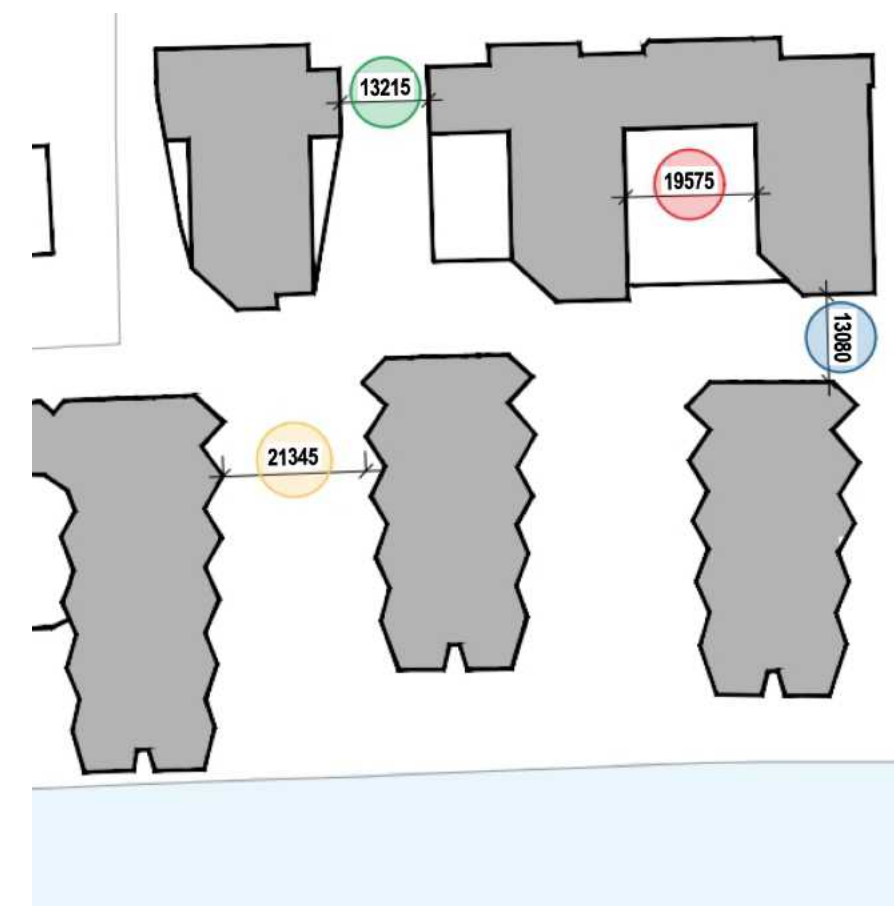
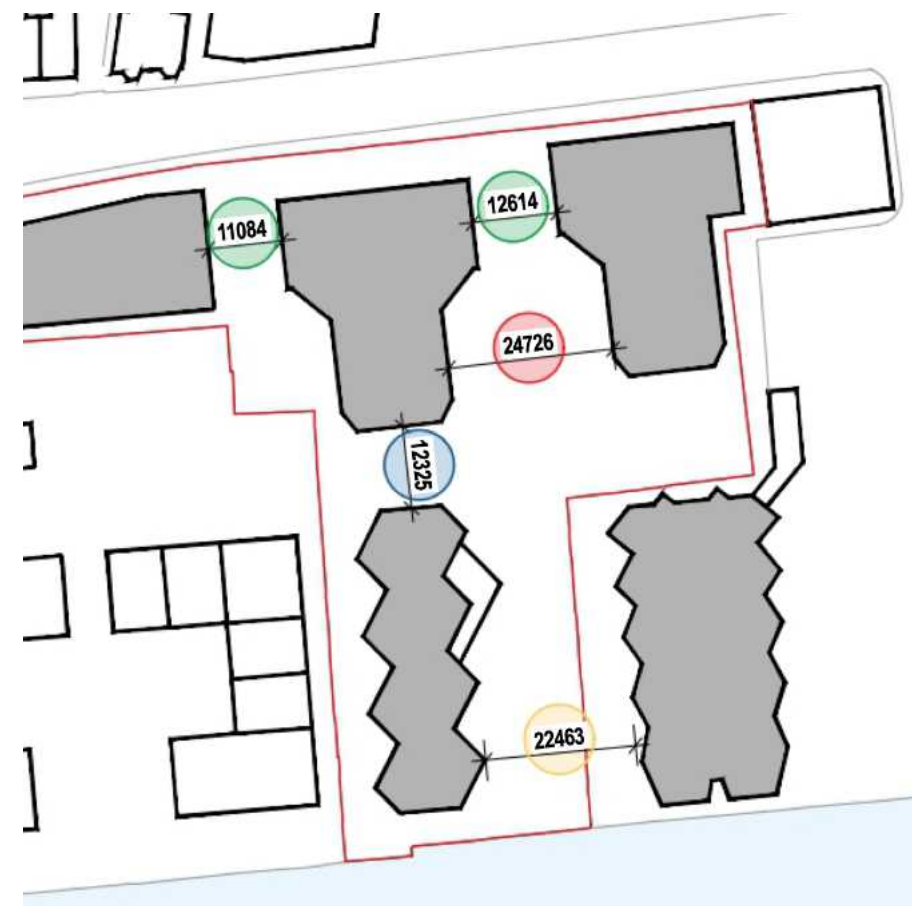
7.33 In longer-distance oblique views along the street, the further storeys would become visible, seen in profile. However, the buildings would be relatively distant in these views, and they would also be seen in the context of the other nearby buildings, on the Free Wharf and former Civic Centre sites. Views of the proposed development alongside those other new developments can be seen in the verified views within the Townscape and Visual Impact Assessment (TVIA) which accompanies this application.

#### Views Within the Site

7.34 Within the site, pedestrians would have priority. Upon entering the site from Brighton Road, they would be flanked by buildings of 5 storeys, which would step up to 7 storeys in height. Block 4 would step up to 8 storeys at its highest point, albeit this would not be particularly apparent within the central space, unless the viewer were to stop and look directly upwards. The space within the site would also widen rapidly upon entering the site, and this would ensure that pedestrians would not feel too enclosed.

7.35 Travelling south, pedestrians would climb a shallow slope, at the end of which would be a raised deck. This would be a broad space, with open views between buildings to the north, east, south and west. The most arresting view from this location would be looking back to the south, through the centre of the site towards the river. This would be viewed between Block 4, and Block A of the approved Free Wharf development. These would both be tall buildings, but their height would not be the main feature of note in the view; the view towards the river would be the visual focus, and a difference of one or two storeys to either building would not make any notable difference to the view from this point. The river would become increasingly prevalent in this view on travelling south.

7.36 The spaces within the site would also be filled with new landscape planting, and a rich variety of hard landscaping, including public art. This would also claim a pedestrian's attention, and it would help to ensure that this space was orientated at a human scale.



Images illustrating the relating spacing between buildings on the application site, and in the approved Free Wharf development.



### Spaces Within the Site

7.37 The spaces between the buildings would be similar to those accepted on the adjacent Free Wharf development. This is illustrated in the adjacent image, which shows the dimensions of the spaces between the individual blocks proposed within the application site, and those approved on the Free Wharf development; it is clear that the distances are similar. The proposed development would fit in with the grain of development to the east.

### Views Across the River

7.38 The proposed development would be visible from the Adur Ferry Bridge. Other than views from Brighton Road, and within the site, this would be the most common public view of the site. From the bridge, the proposed buildings would be seen alongside the approved buildings on the adjacent Free Wharf site, the taller element of the Civic Centre site, and the recent Mariner's Point development. This view was shown to the Design Review Panel, who agreed that the height of the buildings would fit in with these other

buildings, in terms of its scale and appearance (see Section 6 above). The buildings have since been reduced in height by a full storey.

7.39 The development would also be visible from the southern bank of the river. Views from Riverside Road would be limited to glimpses between buildings, and the development would not be clearly visible in these views. The images shown in viewpoints 4 and 5 on the map on page 11, in Section 2 above, show the publicly accessible locations from which the proposed development would be most easily visible. These views would largely be seen by residents living in this area, as it is not a busy public thoroughfare.

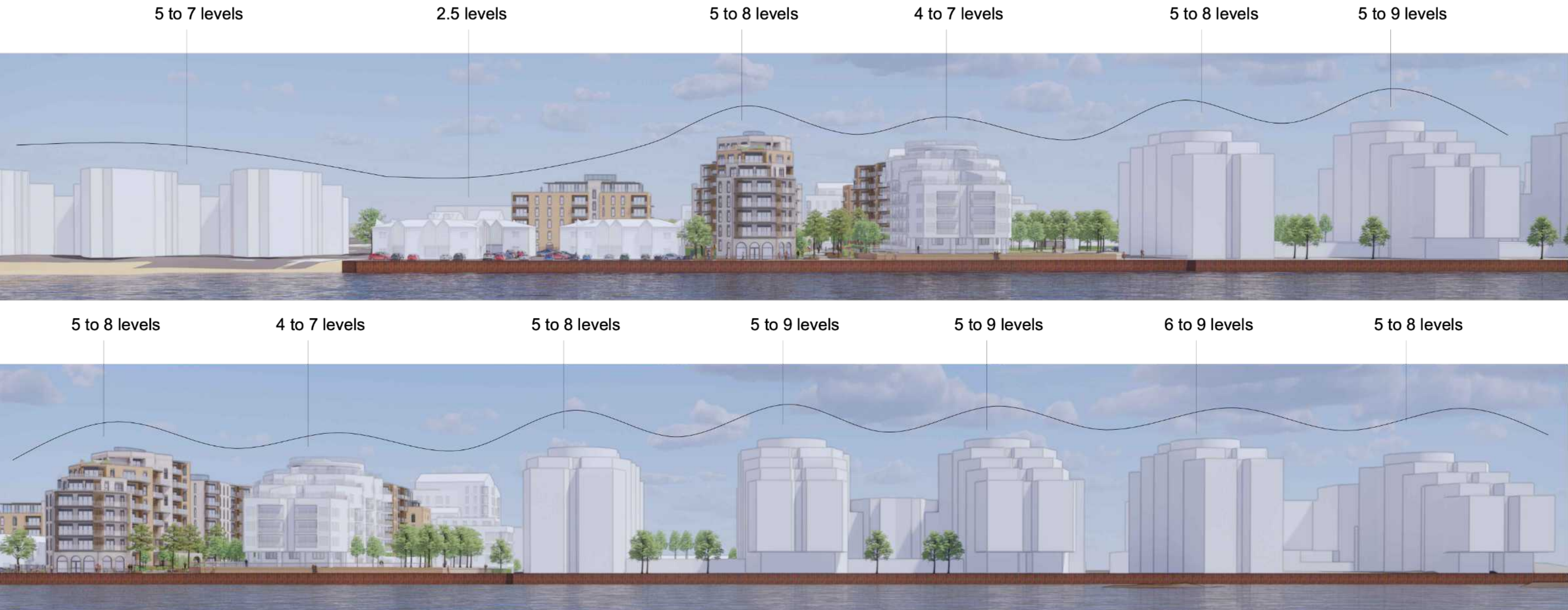
7.40 When seen from this angle, Block 4 would be the most easily visible part of the development, and it would be seen in the context of the blocks of the Free Wharf development alongside it. The verified view opposite shows that it would be seen as having a similar height to the adjacent Building A of the Free Wharf development. It would also be slimmer than Building A, and its overall scale would clearly be compatible with its surroundings. It would



Verified view of the development seen from the Adur Ferry Bridge, with the Free Wharf and proposed Civic Centre developments shown in block form.



Verified view of the development, seen from the southern bank of the river, with the Free Wharf and proposed Civic Centre developments shown in block form.



Views of the proposed development from the opposite bank of the river, in the context of the completed Mariner's Point development, and the approved Free Wharf development, which is under construction.



accord with the guidance in the JAAP, with a height of 5 storeys on its river frontage, and then stepping up from there. The steps would be regularly spaced, creating a pleasing shape I near and longer-distance views.

7.41 The views opposite demonstrate the way the buildings would complement the scale of the approved development at Free Wharf, and the now completed development at Mariner's Point.

## Appearance

### Design of the Buildings

7.42 The Townscape and Visual Impact Assessment (TVIA) which accompanies this application notes the following with regard to the design of the buildings:

"The Shoreham Riverfront has long been a hive of changing industrial activity associated with the fortunes of the harbour. Large scale buildings and buildings with wharf style architecture are a common feature. The proposals for the Site will enhance this by taking

reference from this heritage, notably the stepped profiles and pitched roof scape, and will therefore be reinforcing the harbour character."

7.43 We consider that this comment accurately reflects the essential approach to the design of the buildings. They would have a modern architectural appearance, but their appearance also has its roots in a tradition of larger commercial buildings in this part of Shoreham.

7.44 We have explained in Section 6 that the design of the proposed buildings has been subject to extensive discussions with the Council, Design South-East, and the local community. We have also explained in Section 6 the way in which the comments which have been made on the emerging design has influenced it. Most recently, the comments made by the Council's Planning Committee, and their decision to refuse the previous application, have influenced further changes to the design, with the height of the three tallest buildings each reduced by

a storey. This has been accompanied by a change in the materials used for the buildings' top-most storeys, which would have largely glazed frontages, whilst the rear parts of these storeys on Blocks 2, 3 and 4 would be clad in a brick which would match the rest of those buildings. This approach is intended to provide the upper storeys with a lightweight appearance, when seen in glimpsed and longer-distance views from Brighton Road.

7.45 Views of the development from the Brighton Road frontage would also be influenced by new landscape planting within the street, and by planting on flat roof spaces, where this would be visible. Together with the way that the buildings would be set back from the site's current frontage position, this would create a broader and more attractive streetscape.

7.46 The design of Block 4 differs to some extent from the other buildings. Whilst the buildings on Brighton Road are essentially rectilinear in their form, Block 4 uses far more acute angles in its design. This is also a feature of the southern part of the Mariner's Point development, and the



The Origami Building.

buildings on the Free Wharf site, where they overlook the river. One of the benefits of this approach is to give a greater number of residents views out towards the River Adur, and the sea beyond. Another benefit is also to reduce the potential for residents within Block 4 and Building A of the Free Wharf development from overlooking one another, as we note below. The design of Block 4 was inspired by a famous French building, the Origami Building, in Paris. Another feature that these two buildings have in common is the use of vertical wooden slats, which create a blind to help minimise the effect of overheating from direct sunlight, and also block sea winds. These features would help to create a striking and attractive building, which would help to enhance views of the site from the river.

Views Within the Site

7.47 The public areas within the site have been designed to provide attractive environments, with new landscape planting throughout and plenty of interesting details which would catch a person’s attention, upon entering and moving through the site. As the Landscape Strategy sets out, the intention is to provide a distinctive sense of place. The landscape planting within the site would be one of the most immediately noticeable elements, with trees lining the main routes through the site, and lower-level planting dispersed throughout the site. The Landscape Strategy explains how the site would be divided into separate character areas, which would each have their own distinct characteristics.

7.48 There would also be a number of other details, which could include public art and bespoke hard landscaping, for instance depicting elements of the site’s history. It is envisaged that these details would be worked out in response to planning conditions. This is likely to

involve engagement with local people, and the commissioning of local artists, and it is not a process which can be undertaken at this stage.

7.49 The proposed buildings would also form an important element of the site’s character. They have been designed with care, to ensure that they would both function well, and be attractive. For instance, the entrances to the buildings have been positioned and designed to be easily legible, being close to the main thoroughfare, and announced by projecting canopies, which would also shelter people from rain.

7.50 The buildings would be clad in high quality materials, including red and buff brick, timber cladding and decorative metal panels. These would largely be natural materials, with a warm appearance, and they would help to create an attractive environment. They would be complemented by the hard landscaping, which would also use timber and metal, plus a variety of paving materials.

Views Looking Towards the Site

7.51 Views of the proposed development from the wider area are considered in the TVIA; some of these views are shown above, in relation to the discussion of scale. The TVIA considers how the proposed development will appear in its context, both in relation to the existing surroundings, and the new developments on the adjacent Free Wharf and Civic Centre sites. It also considers a range of views of the site, both at close quarters and in longer-distance views, including from within the town centre and the South Downs National Park; the locations of these views were agreed in advance with District Council Officers. The TVIA has been prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3), and also in light of local and national planning policy requirements, which are noted within the report.

7.52 The TVIA concludes that the wider landscape to the north of Shoreham-by-Sea, within the South Downs National Park, has a high value, and a high sensitivity to change; the townscape in the area local to the application site has a low vulnerability, due to its lack of historic buildings, and commercial nature. The application site is also assessed as having a low sensitivity to new development. The TVIA also considers the sensitivity of specific views of the site; those from Brighton Road and the adjacent area were broadly considered to have a low value and a low sensitivity, whilst other views, such as that from the southern bank of the river, were considered to have a moderate value, and a high sensitivity. Some other views, such as from within the town centre and the South Downs National Park, were considered to have a high value and sensitivity, but there would be no harm, as the development would not result in any notable effect on them. The TVIA also concludes as follows:

- The proposed development would have a moderate adverse impact on the riverfront area during the constriction period, but that this will

change to a moderate beneficial effect once the development has been completed, “as the proposals will result in a notable regeneration of the Riverfront as an important link between the land uses north of Brighton Road and the waterfront”.

- The proposed development will bring about an improvement to the eastern entrance to the conservation area “by enhancing the streetscape of Brighton Road and reinforcing the sense of arrival from the east”.
- The site itself will be subject to a moderate beneficial change, “as the site features will be replaced with a high quality vibrant residential scheme with associated public realm which will add amenity value to the site”.

7.53 Similar conclusions are reached with regard to short-distance views of the development from the nearby streets, and from the Adur Ferry Bridge, where short-term adverse effects during the construction period are replaced by



The entrances to the buildings have been designed to be clearly visible, and easily understood by pedestrians.





beneficial effects when the development is completed. The TVIA notes that effects will be increasingly beneficial over time; the assessment of the likely effects after 15 years factors in the fact that the surrounding developments will also have been completed, and the proposals will be seen in this broad context, whilst the landscape planting will have matured, and the air source heat pump boxes will have been removed from the tops of the buildings. Overall the TVIA concludes as follows:

“Any ‘Adverse’ townscape effects will be temporary and associated with construction activity and the typical works to facilitate the development. Once complete the scheme will demonstrate a positive contribution to the streetscape and improved quality of the local townscape character. There will not be any negative Residual Effects on landscape or townscape character.”

Landscaping

7.54 New landscape planting would be provided throughout the site, and it would be integral to the site’s appearance. As noted above, details of the approach taken to the design of landscaping, and the different character areas within the site are set out in the Landscape Strategy document which accompanies this application.

7.55 The landscaped areas have been designed with the intention that they would form a continuation of the landscape which has been approved for the adjacent Free Wharf development. This is intended to provide a continuous public realm, within which people will easily be able to walk from one site to the next. As noted above, the open spaces within the site would be of similar dimensions to those within the Free Wharf development, and there would also be similarities to the landscape design within the two sites. But the landscaped areas within the application site would also have their own distinctive character.

7.56 The site’s frontage on Brighton Road would be improved with new landscape planting. Together with any new planting which may be provided on the land opposite, in relation to the redevelopment of the formed Civic Centre site, this could create a new avenue of trees on both sides of the road, which would greatly enhance the character and quality of the public realm in this location.

7.57 Landscaping would be used throughout the open spaces within the site, with regularly spaced trees, and low-level planting within and around the edges of the open spaces. Intermittent running water would also be seen, in a rill within the central part of the site, through which some of the surface water would be drained overland.

7.58 Some of the buildings would incorporate rooftop gardens, for use by residents. These spaces have been designed individually, and they are also shown on the proposed Landscape Masterplan, opposite. They would provide further amenity spaces for residents, in addition to the balconies and public open

spaces, and amenity spaces within the wider area, such as The Ham. They are a feature which has not been provided on the adjacent Free Wharf site, or the former Civic Centre site.

7.59 The comments from Design South-East set out in Section 6, and at Appendix 3, raise questions over whether the proposed landscaping can realistically be achieved and maintained. Allen Pyke Associates have given very careful consideration to the space available for tree pits, and the species of tree which can be provided. Suitable species of tree are suggested, which would do well both within the available space, and in the local coastal climate. Details of the proposed planting are set out within the Landscape Strategy, and any perceived need for further or amended details of planting could also be controlled by suitably worded planning conditions. The Applicants are confident that the trees proposed, and shown on the application drawings, would grow well and provide a high-quality public realm. We anticipate that detailed elements of design, such as that relating to the provision of tree pits, can be controlled by a suitably worded condition





Humphrey's Gap

EXTENT OF BASEMENT CARPARK

Landscape Masterplan,  
by Allen Pyke Associates



Biodiversity

7.60 A Preliminary Ecological Appraisal has been carried out by The Ecology Partnership, and their report accompanies this application. The site itself is largely barren, and contains little vegetation, other than a small amount of scrub on the southern edge of the site by the river, and on an old flat roof, which had over time naturally developed a small amount of flora. At present, it has negligible ecological value. Other than this, the site is dominated by buildings and tarmac, which offer no benefit to local wildlife.

7.61 The mud flats within the River Adur, around 40m from the edge of the site, are a priority habitat, which is used by a large number of birds. It is therefore clearly important to minimise change to the mud flats, and the application proposals have been designed with this in mind. The habitat map right shows that the site is close to habitats including sand, mudflats (dark brown), coastal vegetated shingle (cyan), coastal salt marshes (light green) and semi-improved grassland (purple).

7.62 The Preliminary Ecological Appraisal concludes that the proposed development would not have any adverse impacts on protected or priority species. However, the proposals do represent an opportunity to provide a notable net gain in biodiversity within the site. A number of measures are suggested within the report for the enhancement of biodiversity within the site, and beyond. The proposed development has been designed in consultation with The Ecology Partnership, to ensure that it would maximise the opportunity to enhance biodiversity.

7.63 The various landscaped spaces within the site offer opportunities for the provision of features which will enhance biodiversity within the site. New trees, shrubs and plants would be provided, using native species which are suitable for this coastal area. These would be located throughout the site, both at ground level and within roof gardens.

7.64 In addition to roof gardens, new green roofs would also be provided on the buildings. These would provide a mix of plant species, and other features such as log piles, sand and shingle, which would provide opportunities for a variety of

invertebrates. Insect and bird nesting boxes would also be used on the buildings' roofs. Together these features would provide aerial green corridors within the landscape, which would benefit insects and birds.

7.65 It is also proposed to provide green walls on the buildings, which can create further niches for new habitats. They can also provide a linkage from green roofs to the ground. They would be clad in species such as climbing ivy, flowing clematis and honeysuckle.

7.66 The river wall can also be adapted, to provide a new habitat for invertebrate, crustacean and algae biodiversity, through the addition of timber baulking.

7.67 In addition, lighting within the site would be designed with care to ensure that it would not have any adverse impact on bats and birds. This is a matter which we anticipate can be dealt with by an appropriately word condition.

7.68 With the above enhancements, the proposed development could provide a notable net increase in biodiversity within the site, and to the benefit of the local area.



Habitats around the application site, from the Government's [magic.defra.gov.uk](https://magic.defra.gov.uk) website.



## Flood Resilience

7.69 As we have explained in Section 5 above, the site is at risk of flooding both directly from the River Adur to the south, and also from the Riverside Business Centre to the west, and Brighton Road to the north. This is because the surrounding land is at a relatively low level (around 4m AOD), and in a flood event it would be inundated. It is therefore necessary to design the defences for the site so as to keep out water on these three sides.

7.70 The Free Wharf site to the east is under construction, and it will in time provide flood defences up to the site's eastern boundary. It will achieve this by raising the level of the land to 5.6m AOD, a level which is considered by the Environment Agency to be suitable to allow for residents to leave the site in a flood event.

7.71 The same approach is proposed within the application site, where the central area would be raised to this level. The level which would be at 5.6m AOD is outlined by the blue dashed line on the drawing opposite. This would extend into

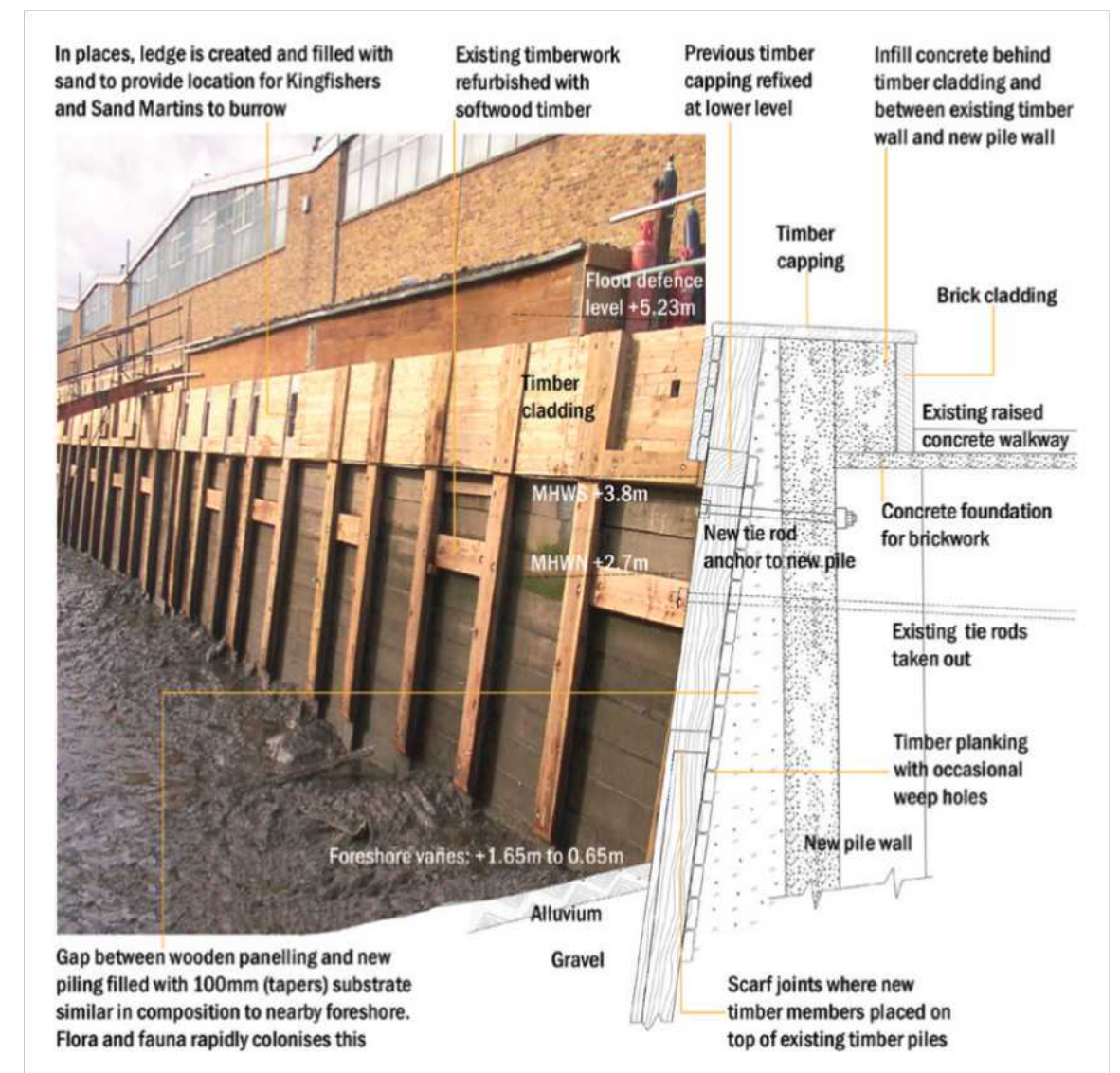
the entrance lobbies, but floor levels within the buildings would then step up by 0.6m, to 6.2m AOD, which would be the finished floor level for ground floor accommodation.

7.72 From the central part of the site, residents would be able to walk to the southern end of the site, and through on to public area within the Free Wharf site, to the east. They would then be able to walk through the Free Wharf site, on a route which would be no lower than 5.6m AOD, to Brighton Road; the part of this route within the application site is indicated by the arrows on the adjacent image. This would lead to a part of Brighton Road which is at a higher level to the part outside the site, from which residents would be able to leave the area.

7.73 The basement car park would be protected from flood waters by a flood resistant barrier, which could be raised in the event of a flood. It is anticipated that details of this barrier will be agreed with the Council in accordance with a planning condition.

7.74 This site will form part of the flood defences for this part of Shoreham, linking in seamlessly with the Free Wharf site. In time it is hoped that the redevelopment of the other sites in the Western Harbour Arm, and the Riverside Business Park, will provide fully joined-up flood defences.

7.75 This strategy is outlined in the Flood Emergency Plan and Flood Risk Assessments which accompany this application. These documents also explain the rationale for the levels mentioned above.



An example of ecological enhancement at Deptford Creek, using timber baulking; this image is taken from the online resource Estuary Edges: Ecological design Guidance (Environment Agency, 2008).

## Management of Communal Areas

7.76 The hard and soft landscaping within the site would need to be maintained regularly. This work would be undertaken by a management company, paid for by a service charge on the apartments. This arrangement would ensure that these spaces would be managed in perpetuity. The Applicant is also discussing the possibility that the management of the public spaces within the site could be tied in with the management of those within the Free Wharf site. move toward or from the boundary of the conservation area. It also finds that key views of the Church and conservation area would remain unaffected. Similarly whilst there would be a change to the visual appearance of buildings visible from the listed buildings at 55–57 New Road, this would not result in harm to the significance of these listed buildings. The Heritage Statement concludes that there would be no harm caused to any of these heritage assets, either considering the proposed development alone, or cumulatively with the Free Wharf and proposed Civic Centre developments.

## Residential Amenity

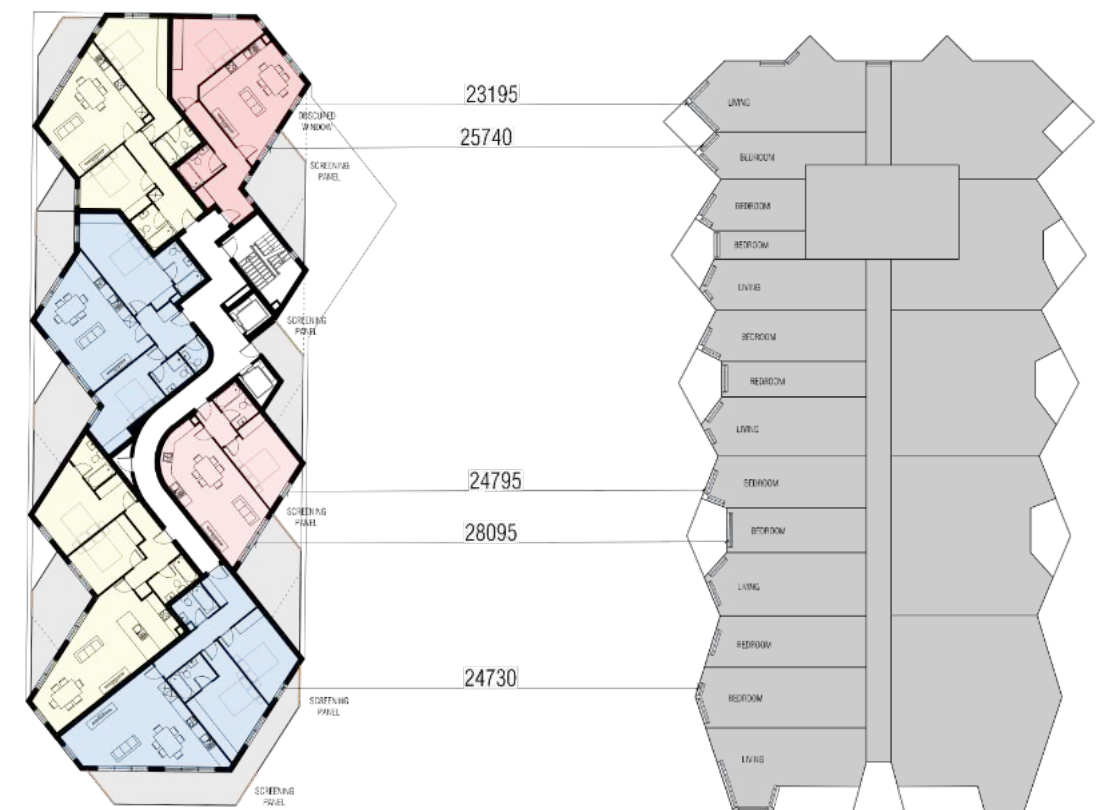
### Overlooking

7.77 The Council's Space Around New Dwellings and Flats SPD requires a separation distance of 28m between windows in blocks of flats which are 3 storeys or more in height. The proposed development would comply with this requirement in almost all cases, and where it would not, views would be screened to protect privacy. The image opposite shows the window-to-window relationship between Block 4, and Building A of the Free Wharf development, which would be around 22m apart at the nearest point. Rooms within Block 4 have been positioned and orientated to minimise the potential for them to be overlooked, with windows generally looking south, and stairwells and corridors also positioned on the building's eastern side. Where the potential for overlooking remains, either obscured glass or new privacy screens would be used to prevent direct overlooking. Bedrooms can also be expected to be fitted with privacy features, such as venetian blinds, which would further protect their occupants.

7.78 Any potential for overlooking between the blocks within the site would also be avoided by ensuring that side windows would either be obscure glazed, or set at a high level, so as to avoid the possibility of residents overlooking one another's windows at relatively close range.

### Balconies

7.79 The proposed apartments would be provided with private amenity areas on balconies. These balconies would be positioned in a way which would ensure they would not be overlooked, so as to preserve the privacy of the residents using them. The balconies serving ground floor apartments would be set 0.6m higher than the ground level within the centre of the site, and they would also be set back behind planted areas, which would ensure that pedestrians in the public areas would not be able to come too close to them. Residents would also have the option of including screening within the balconies, to further enhance their privacy.



The positioning of the windows in Block 4, and the provision of privacy screens, would prevent direct overlooking of windows in Building A of the Free Wharf development.



Noise

7.80 We have noted in Section 5 that noise from Brighton Road was anticipated as being a factor which would shape the design of the proposed development. The application is accompanied by a Noise Assessment by Hawkins Environmental. This concludes that it would be necessary to provide enhanced glazing for the apartments which face Brighton Road, to mitigate the noise generated by road traffic. This would be accompanied by mechanical ventilation, which would ensure that these apartments would be well ventilated without the need to open their windows.

7.81 The buildings on Brighton Road would screen the remainder of the site, and help to reduce road noise. This would mean that it would not be necessary to provide the same sort of mitigation measures for the apartments elsewhere within the site.

7.82 Whilst balconies on the Brighton Road frontage would also be subject to higher levels of noise, the residents within

these apartments would have access to amenity areas within the site and wider area which would be subject to lower levels of noise. The Noise Assessment concludes that the proposals would be acceptable in this regard.

Overheating

7.83 Wooden slatted panels would be provided which would filter sunlight before it came into contact with the windows in the apartments. This would help to reduce the likelihood of them overheating due to excessive passive solar gain. In addition, external blinds would be provided, which could be controlled by the occupants of the apartments, and which would also stop the sun from hitting the windows, and warming up the apartment; details of these are set out in the Energy and Sustainability Statement which accompanies this application.

7.84 The provision of trees within the site would also help to cool public spaces.

This is both due to their shading of the ground, and the cooling effect which trees have on the space around them through evapotranspiration. This would help to make these spaces more pleasant on hot summer days.

Wind

7.85 The apartments have been provided with wooden slatted screens, which would reduce the effect of wind from the river and sea on their windows and balconies. Meanwhile, within the site, the proposed trees would help to mitigate the effect of wind on the public spaces. The approach taken in this regard is similar to that which has been approved by the Council on other sites within the Western Harbour Arm, including the Free Wharf site, and Kingston Wharf.

Safety and Security

7.86 The proposed development has been designed with care to ensure it would be as safe as possible.

7.87 It is intended that access to the basement car parking area would be restricted to residents, and Car Club members. This is intended to prevent it from becoming a location which could attract antisocial behaviour. The car parking area would be well lit, to avoid any dark corners. Careful consideration would also be given to the use of CCTV cameras in this area, to further deter criminal behaviour.

7.88 Access to the residential parts of the buildings would also be carefully controlled, and restricted to residents. Deliveries would be made to the dedicated space at the ground floor of Block 2, and so it would not be necessary or even possible for delivery drivers to access the buildings, unless they were granted access by a resident.

7.89 The roof gardens would be set in from the edges of the buildings, to

ensure that residents could not accidentally fall from them.

7.90 The public areas within the site would be designed with care to ensure that they would be safe for everyone. Surfaces would be designed to avoid the possibility of people slipping, and hand rails would be provided adjacent to stepped areas. Play equipment would be provided with soft surfaces to protect children, should they fall. Pedestrians would also be given priority over vehicles and cyclists within the public thoroughfares, to help ensure their safety.

7.91 Lighting would be provided throughout the public areas within the site to ensure that there would not be dark corners, and that paved areas would be well lit. This would be designed to ensure these spaces felt safe for all (whilst avoiding light spill outside the site which could have an adverse impact on local wildlife).





### Sustainable Development

7.92 This application is accompanied by an Energy and Sustainability Statement by Daedalus Environmental, which explains the approach taken by the application to various matters, including the provision of energy demand, supply, and performance in individual apartments, and also matters relating to the potential for overheating, and the performance of the commercial units. It also considers wider issues relating to sustainable development, including construction materials and waste management, carbon emissions generated through transport, water use, and biodiversity. It responds directly to the policy requirements set out within the Adur Local Plan and Shoreham Harbour JAAP. We do not address all of the many issues covered by that statement here, but note the following points, which are of particular importance.



7.93 This would be an inherently sustainable form of development. The site's location, close to the town centre and with excellent public transport connections nearby, would help to encourage travel by sustainable means. The strategy towards the provision of parking (a restricted level of car parking and high level of cycle parking) would also help to encourage travel by sustainable means. Electric vehicle charging points would be provided for residents, along with Car Club vehicles, which would likely also be electric vehicles. The Framework Travel Plan also sets out measures which would be employed to encourage sustainable travel. The future operation of the site would not lead to high levels of carbon emissions generated by transport.

7.94 The development would also connect to the Council's planned Shoreham Heat Network, which would provide hot water for use in the apartments, and for heating. In the short-term, air source heat pumps would be used, whilst space would be left for the necessary plant to connect to the Heat Network once it is operational.

7.95 As we have noted above, measures would be employed to prevent apartments from overheating. This would reduce the need to use artificial means such as mechanical ventilation to cool the apartments, which would in turn reduce energy use.

7.96 The apartments would also be designed in a way which would make them inherently energy efficient. This would be achieved by means such as providing a high thermal mass, to reduce the need to use energy to heat them. Other measures would also be used, such as low-energy lighting and energy efficient appliances. Similarly, water use would be minimised with the use of low-water appliances.

Heritage

7.97 Details of heritage assets close to the application site are set out in Section 2 above, and in the Heritage Statement which accompanies this application. This concludes that the application site currently makes no contribution to the significance of the Shoreham-by-Sea conservation area, or the setting or significance of the only nearby listed buildings, at 55 and 57 New Road. It is also noted above that views of the most significant and visible listed building in the local area, St Mary de Haura Church, would not be notably affected, and no harm would be caused to the building's setting or significance.

7.98 The Heritage Statement also considers the effect the proposed development would have on heritage assets within the local area. This concludes that there would not be any harm to the heritage significance of the conservation area, or listed buildings including the Grade I listed St Mary de Haura Church. It finds that the proposed buildings would not interrupt, compete with or disrupt an appreciation of heritage significance as

one move toward or from the boundary of the conservation area. It also finds that key views of the Church and conservation area would remain unaffected. Similarly whilst there would be a change to the visual appearance of buildings visible from the listed buildings at 55-57 New Road, this would not result in harm to the significance of these listed buildings. The Heritage Statement concludes that there would be no harm caused to any of these heritage assets, either considering the proposed development alone, or cumulatively with the Free Wharf and proposed Civic Centre developments.



### Pedestrian Access

8.1 The main pedestrian access to the site would be through the broad pedestrianised space between Blocks 2 and 3. The access would have a clear pedestrian priority, over both vehicles and bicycles. This access would not be provided with a bell-mouth access, so as to ensure it did not have the appearance of a highway access for vehicles. Whilst vehicles would be able to use this access, these would be limited to weekly refuse collections, emergency vehicles such as fire tenders and ambulances, and occasional visits from servicing or maintenance vehicles, such as those used by the Environment Agency, who would need access to the river edge. Removable wooden bollards would also prevent vehicles from accessing parts of the site, and limit most vehicles (such as refuse vehicles) to the central area at most.

8.2 As we have explained in section 7 above, the space within the site would be designed at a human scale, and with the needs of pedestrians in mind. It would be a pleasant area which would be used for recreation and play, as well as simply for access.

### Cycle Routes

8.3 This planning application proposes to safeguard land at the site's frontage, to allow for the provision of a new cycle lane, through the widening of Brighton Road (the A259). This would accord with proposals put forward by the Highway Authority, West Sussex County Council, for the provision of a "Shoreham to Brighton and Hove border cycle route". Making this land available for the new cycle route would in itself make a valuable contribution towards the improvement of sustainable transport facilities in the local area. Brighton Road is a major east-west route, used by many cyclists, and improvements such as this will help to encourage more people to cycle in future.

8.4 The frontage of the proposed development has been designed with the intention that it will minimise the changes required in the future, when the new cycle lane is constructed. This will not happen until other sites come forward for development along Brighton Road. However, the necessary land would be transferred into the ownership of the County Council through a s106 legal



The site's road frontage, both as it will be constructed initially (top image) and as it will be in the future, when the new cycle lane is constructed on Brighton Road.

agreement. Funds would also be provided to the County Council, through the s106 agreement, to pay for the future construction of the cycleway

8.5 New routes would also be provided through the site, which is not currently publicly accessible. This would include a connection to the new riverside walkway which is to be provided as part of the development of the adjacent Free Wharf site. In future this will be a major cycle and pedestrian route, linking the various new developments in the Western Harbour Arm to Shoreham town centre and the railway station. As the western-most site in the Western Harbour Arm area, as identified by the JAAP, the proposed connection between the riverside walkway, and the new north-south route through the site, will become important components of this walking and cycling route. However, pedestrians would be given priority over cyclists within these areas, to ensure their safety.

Servicing Arrangements

8.6 One of the commercial units in the ground floor of Block 2 will be reserved for deliveries, such as mail order products by companies such as Amazon. Delivery drivers would park in the bay to the front of Building 2, just off Brighton Road, and deliver their package to this unit, which would also be on the road frontage. This would minimise the amount of time required for drivers to make deliveries. It would ensure that they would not need to enter the site, for instance to deliver packages to Block 4. It would also greatly reduce the number of vehicle trips required into the centre of the site, help to ensure that it would remain a pedestrian-friendly environment, and help to maintain a safe and secure environment within the buildings.

8.7 The commercial units would all be serviced from their main frontages, either facing Brighton Road or the river. It would be possible to drive service vehicles to positions close to the front of all of these commercial units. A servicing bay would be provided at the centre of the site's

Brighton Road frontage, which could be used for deliveries. Similarly it would be possible to drive vehicles through the site to the commercial unit next to the river, to make occasional deliveries.

8.8 Refuse collections would be made from dedicated areas close to the bin storage rooms at the ground floor level within each block. A service bay would be provided on the site's road frontage, and space would also be provided at the entrance to the site, close to the bin stores for Blocks 2 and 3. Building 4 would be serviced by refuse vehicles entering the site. Emergency vehicles would also be able to access the site to reach Block 4, if this should be necessary. As neither of these occurrences would be any more regular than once a week, this would not materially change the character of the central space as a pedestrianised environment. Tracking drawings of refuse and delivery vehicles are included within the Transport Assessment.

Inclusive Access

8.9 All apartments would be designed to meet building regulation requirements with regard to disabled access. In addition, all entrances would be provided access by ramps of suitable gradients.

8.10 Blocks 2, 3 and 4 could be accessed from their basements; Block 1 would not have a basement. In the basement area, which would be accessed by vehicles from the entrance between Blocks 1 and 2, an area of car parking would be provided. Disabled parking spaces would be located close to the access cores for Blocks 2, 3 and 4. These cores would each contain a stairwell and two lifts. This would enable disabled people, and those with restricted mobility, to drive into the site and park close to the buildings' access cores, and take the lift up into the building, thus minimising the distance they would have to travel between their vehicle and apartment.

8.11 The delivery bay on the site's frontage would be sufficiently large to allow it to function as a disabled parking bay, should this be required by people visiting the ground floor commercial units.

8.12 The parcel collection point at the site's frontage, within Block 2, would be staffed by a concierge service, paid for by a service charge on the apartments within the site. From here, staff would be able to deliver packages to residents, should they be unable to come to collect them themselves.



Land Use	Expected parking demand	Disabled parking	EV parking	Minimum cycle parking
1 bedroom apartments (×76)	46	2	19	38
2 bedroom apartments (×100)	110	6	45	50
Commercial space (595m <sup>2</sup> )	20	1	N/A	9
Total	176	9	64	97

Disabled parking is 5% of total; EV charging points are 41% of total.

Car Parking

Encouraging Sustainable Travel

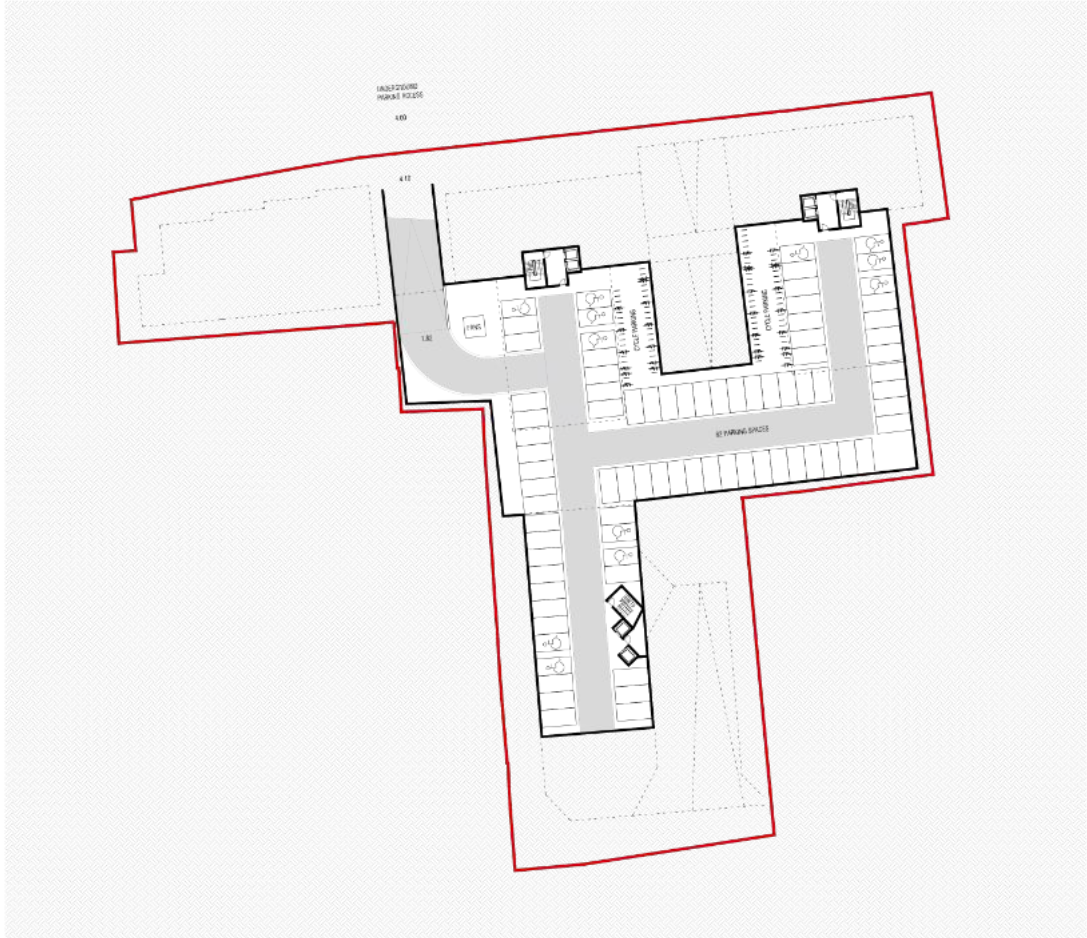
8.13 32 of the car parking spaces would be provided with electric vehicle (EV) charging points (this is 41% of the total number of spaces, as required by the County Council’s parking standards). In addition, passive provision would be provided for all other parking spaces, to ensure that they could be retrofitted with EV charging points in the future, as and when this was required.

8.14 This application is accompanied by a Framework Travel Plan by Stantec; this sets out ways in which the proposed development has been designed to reduce the need to travel by car, and how more sustainable modes of transport will be promoted once the development is built and occupied. One of its proposed measures is that the development should include up to 8 car club vehicles, to be kept within the site. These would be made available for residents to book, and use when required; it would allow them the option of occasional car use, without having to keep a car themselves. We understand that car club vehicles are also proposed for other developments in the

Western Harbour Arm area, including on the adjacent Free Wharf development, and there is scope for their use to be co-ordinated between residents of these developments. These vehicles would also be open for use by local residents, should they join the car club.

Level of Car Parking Provision

8.15 The level of car parking proposed is below that suggested by West Sussex County Council’s Guidance on Parking at New Developments (2020); this states that the expected parking demand for a 1-bedroom apartment is 0.6 spaces, and for a 2-bedroom apartments it is 1.1 spaces, whilst for commercial space it is 1 space per 30 sq m floor area. It also sets out requirements for the minimum level of disabled parking and EV charging points. The theoretical level of need for parking within the site, as implied by the County Council’s standards, is set out in the table above.



Proposed basement plan.



Proposed ground floor and site plan.





8.16 The application proposes to meet the level of disabled parking and EV charging points required by these standards, in full. However, it is proposed to provide 78 car parking spaces within the site's basement level, plus the potential for a short-stay disabled parking space on the street frontage, in the delivery bay. This level of car parking was agreed with the Highway Authority, West Sussex County Council, in pre-application discussions relating to a larger development, for 183 dwellings. The Travel Plan which accompanies this application explains that the Applicant and Highway Authority have agreed it is a suitable level of car parking, for the following reasons:

- The application site is located close to public transport connections, including the railway station (c. 500m), various bus stops (well within 400m walk) and a proposed new cycleway which would be provided outside the site on Brighton Road.
- Providing a lower level of car parking will help to reduce levels of car ownership amongst people living within

the site, and so reduce reliance on cars as the principal mode of transport.

- Development sites such as this, which have good access to public transport, should have greater densities of development, with less space given over to car-related infrastructure.
- The proposed development will provide a commitment to the promotion and support of alternatives to car ownership, including up to 8 car club vehicles, non-car modes of transport and active travel.
- A Framework Travel Plan is provided with the planning application, which sets out means by which sustainable modes of travel will be encouraged, including car sharing, cycling and encouraging the use of public transport.
- The commercial development will not be allocated parking spaces, other than the potential for as short-stay single disabled space, so as to encourage visitors to arrive by sustainable modes of transport.

- The developer will work with the Highway Authority, to understand the progress of the Shoreham Road Space Audit, and whether any recommendations are applicable to this development, i.e. there is a need to put any new parking restrictions in place, or design-related improvements that will help to ensure local transport networks are not impeded.

8.17 We also note that there is a strong possibility that the commercial units will be used in large part by residents of this development, or people living within walking distance of the site. This could, for instance, be as flexible office space, for use by people who would either want to rent a desk space, to allow them to work outside their home, or run a small business. Similarly, the Class E use would allow the commercial units to be used as a creche, a café or a shop. This development, and others coming forward within the Western Harbour Arm, will provide accommodation for many new people, and by doing so they will help to provide a high level of demand for these spaces. As such, they will serve people who do not need to use a car to access them.

8.18 We consider that the proposed level of car parking is an entirely appropriate response to the site and its context. The site's highly sustainable location makes it ideal for minimising future car use. There is already a problem with road congestion in the local area, and poor air quality due to emissions from vehicles. It is important to minimise the level of car use amongst people living within and visiting the site, so as to help provide a more sustainable local environment, and minimise the impact this development would have on the local area.

8.19 In this regard, it is worthy of note that the Transport Statement which accompanies this application explains that the proposals will result in a net increase in trips of only 34 vehicles in the morning peak, and 33 in the evening peak. This amounts to just over 1 vehicle every 2 minutes, a level which the Transport Assessment shows could easily be accommodated by the local road network; the Transport Assessment describes the effect on the local road network as "negligible". This is clearly a desirable outcome.

### Cycle Parking

8.20 It is proposed to provide 359 cycle parking spaces in the underground parking area. These would be both sheltered from the weather and made secure, accessible only to residents. This is more than 4 times the minimum level of cycle parking required by West Sussex County Council's parking standards, as noted above. This over-provision is intended to encourage residents to keep and use a bicycle, as a practical means of travel, rather than relying on a car.

8.21 In addition, it is proposed to provide 6 cycle spaces for visitors to the commercial units, and 48 cycle parking spaces for visitors to the residential apartments and commercial units. These spaces would all be provided above-ground, within the site.

Public Transport

8.22 The application site is in a very accessible location, as we have noted in Section 2 above. It is within easy walking distance of Shoreham railway station (around 500m or just over 5 minutes’ walk away), and a major bus corridor on Brighton Road, with several bus stops within a couple of minutes’ walk of the site, and a frequent service. The frequency of the service makes it likely that residents would use it for routine journeys, and they would be far less likely to feel a need for a private car. Full details of the local public transport connections available are set out within the Transport Assessment and Framework Travel Plan.

8.23 These public transport connections would allow residents easy access to shops, services and employment. It would be possible, for instance, for people living within the site to commute to work in Brighton or London, or various other major employment locations, travelling only on public transport. The site’s location is a great asset, which the

application proposals have been designed to make good use of, by encouraging travel by sustainable means (i.e. modes other than private vehicles).

8.24 The Framework Travel Plan explains that Travel Information Packs will be provided to all residents, and staff within the commercial units. These will illustrate local bus routes, provide details of timetables and provide links to useful bus and rail websites. They will highlight just how plentiful the local public transport connections are, helping to encourage people to use them.











## Appendix 1

Report of the Coastal West Sussex  
Design Review panel, 63-77  
Brighton Road.

# Design and Access Statement Land at 69–75 Brighton Road, Shoreham-by-Sea

## Appendices

Report of the Coastal West Sussex Design Review Panel

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### The design review meeting

Reference number	1463/150920
Date	15 <sup>th</sup> September 2020
Meeting location	Online via Zoom
Panel members attending	Lorraine Farrelly (Chair), Architecture, Urban Design Steven Bee, Historic Environment, Public Realm, Urban Design Nick Hayhurst, Architecture, Urban Design John Pegg, Landscape Architecture, Urban Design Robin Smith, Architecture, Regeneration, Urban Design
Panel managers	Sogand Babol, Design South East
Presenting team	Tim Waller, Waller Planning Christine Thomson, Waller Planning Martin Bryant, Bryant and Moore Architects
Other attendees	Stephen Cantwell, Adur & Worthing Councils Richard Small, Adur & Worthing Councils Chris Jones, Adur & Worthing Councils Rob Wheatley, Brighton Road Shoreham Ltd. Andrew Halfacree, Flude Property Consultants
Site visit	This review was carried out during the Covid-19 outbreak in 2020. The panel were familiarised with the site through a digital walk-around (in a similar fashion to that which would have been conducted on-site) and self-guided desktop study. The panel members are all familiar with this context and have previously visited Brighton Road and the Western Harbour Arm.
Scope of the review	As an independent design review panel, the scope of this review was not restricted.
Panel interests	Panel members did not indicate any conflicts of interest.
Confidentiality	This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

Report of the Coastal West Sussex Design Review Panel

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### The proposal

Site location	63-77 Brighton Road, Shoreham-by-Sea
Local authority	Adur & Worthing
Site details	This is a 0.685 ha. site housing an existing car dealership, on the Western Harbour Arm in Shoreham-by-Sea. It adjoins the Riverside Business Centre to the south-west. The site is in Flood Zone 3. There are a number of emerging development schemes that are consented, under construction or newly built in the local area, including the Free Wharf scheme, 540 homes adjoining the site on the east, which has recently gained planning consent.
Proposal	The proposal is for 178 homes, circa. 140 vehicular parking spaces with a parking ratio of 0.8 and approximately 750sq.m commercial space at ground floor level.
Planning stage	A full planning application is intended for submission in due course.
Planning context	The site is allocated for residential and commercial development in the Shoreham Harbour Joint Area Action Plan (JAAP), adopted October 2019. It is identified as site WH7. A Tall Buildings capacity study determined the site is unlikely to significantly impact key views to St Mary de Haura Church.
Planning authority perspective	The local authority seeks the panel's advice specifically on the proposal's quality in terms of scale, relationship to neighbours, public realm, open space, green infrastructure, sustainable urban drainage, distinctiveness, layout and uses, proposed flood defences, the waterfront walking route and parking.  The council seek a contribution, through the design, to a new waterfront route and comprehensive flood defences, multifunctional green infrastructure, enhanced coastal biodiversity and green spaces, as well as a new cycle route and mitigated air quality and noise impacts along Brighton Road (A259) to the north of the proposal.

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Summary

This proposal is an important component of the overall vision for the Western Harbour Arm, which has been brought forward proactively by the council. Regrettably, however, we have fundamental concerns about the scheme design and the design process. The planning history and evolution dominated the presentation at the expense of a description of the design itself. As a result, we are able to make only limited comment on the proposed design response and instead provide a set of recommendations to guide the design process moving forward based on what we were presented with. We are committed to helping to improve the scheme through positive and constructive collaboration with the applicant and encourage a return review once our recommendations have been addressed.

Key recommendations

1. Develop a convincing place-led proposal with a positive human experience and local distinctiveness at its root.
2. Produce a comprehensive landscape and public realm strategy, the success of which is dependent upon a significant reduction in the amount of parking.
3. Consider the overall redline boundary and demonstrate a considered and appropriate integration with the existing and emerging context. Distinction of the public and private realm should be achieved.
4. Clarify how the form, height, mass and architectural response is responsive to neighbouring developments and support with detailed studies.
5. Refine and simplify the housing layouts, form, mass and architecture to prioritise user experience.
6. Demonstrate how the development creates a positive human experience at eye-level at the ground and how key pedestrian and cycle movements are supported and complemented on associated frontages.

Detailed comments and recommendations

1. **Landscape strategy, character & placemaking**
  - 1.1. We have concerns about the ground floor layout, landscape and potential character of the scheme, particularly around the arrival sequence into the site and the extent of inactive frontages along potential pedestrian routes. The primary aim should be to develop a convincing place-led proposal, with a positive human experience. We would expect this to be evidenced through an iterative design process and continual testing of the three-dimensional spatial experience, particularly at ground floor, eye-level.
  - 1.2. As part of this, a reduction in the amount of parking in the open space is essential along with the development of a strong comprehensive landscape and public realm strategy. This strategy should clarify the balance between the private and public realm and explore creative ways to seamlessly integrate the flood defence wall along the riverfront into the design so that a visual link with the river is maintained. Further details on the water collection and drainage strategy should be provided, however we are less concerned with the need for urban drainage.
  - 1.3. The balance of built form to open space is questioned. While a reduction in parking is crucially important to deliver an improved landscape strategy, the design team are also encouraged to review smaller building footprints to facilitate higher-quality external spaces with obvious functions. For example, the eastern arrival point into the site from Brighton Road could benefit from a a useful, child-friendly landscape. This can only be accommodated with space gained from reduced parking in this area.
2. **Relationship to the existing & emerging context**
  - 2.1. The character of the Western Harbour Arm is undergoing comprehensive change. We are therefore comfortable with an identity and architectural language distinct from the rest of Shoreham. However, we are not yet convinced the scheme's character is distinctive and complementary to emerging and newly built schemes. More work is needed on the architectural proposal as a whole in terms of form, language (style, features, references to local architectural history and details) and materials. The elevations and material strategies should demonstrably link with a wider narrative about this scheme in relation to others in this location.
  - 2.2. The red-line application boundary is an unusual shape and there could be significant benefits to the council's aspirations for the Harbour Arm if this proposal were to be integrated with redevelopment of the Riverside Business Centre and the site on the north-west of this scheme. We welcome further exploration by both the



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- applicant and authority of the land assembly and its implications on landscape strategy.
- 2.3. A comprehensive design and detailed proposals for how the boundaries and edges of the scheme will comprehensively integrate with adjoining existing and proposed developments is required. Long sections running east-west, and north-south are important to produce as well as larger details at 1:5 – 1:20 at key interfaces. The site's value lies in the riverfront setting and the spatial quality of this part of the proposal should be described in section and three-dimensions.
- 2.4. In light of the loss of employment space through redevelopment, we would welcome clarification of how the new employment spaces will meet the objectives of the Joint Area Action Plan and outlined needs for specific, targeted industries.
- 3. Architecture, density, form, mass, & layout**
- 3.1. The form, footprint and housing layouts require review. There are too many north-facing, single aspect homes (specifically in Blocks 1-3). A more refined, simpler layout strategy with fewer setbacks should be brought forward, that seeks to minimise blind corners, internalised corridors and north-facing single aspect flats. This will help with the overall coherence and appearance.
- 3.2. The building form and mass should be reviewed in tandem with improved housing layouts. We encourage use of a three-dimensional, physical and/or virtual model to test options for how the form and mass of the four proposed buildings on-site, can complement that of the adjacent Free Wharf scheme. A rationale and strategy for the proposed heights, hierarchy, density and form is required in the context of Free Wharf and sites to the north and west. This model could also be used to provide inhabited views of street scenes, a rationale for setbacks, and key views and points of emphasis.
- 3.3. The architecture should be described in three-dimensional, spatial and experiential terms, using physical and digital 3D models, and with integrated context. Long, detailed elevations are required for Brighton Road and the riverfront, as well as more detailed bay studies of the eastern elevations of Blocks 3 and 4 alongside the westernmost Free Wharf building.
- 3.4. Cycle provision is currently inadequate and inconveniently located. The team are encouraged to review relevant best-practice guidance and policies on the ratio of cycle parking to accommodation, and its layout and location.

- 4. Sustainability**
- 4.1. Our standard guidance at planning application stage is that the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy and optimise the use of renewables in order to align with the local and national zero carbon policies and targets. This strategy should be informed by detailed modelling work informed by respected calculation methods.
- 4.2. In light of current climate issues, at an early stage in the development of proposals, we welcome commitments made to sustainable measures, such as net-zero carbon and carbon-neutral targets, with impact on the proposal clearly communicated, for example through the choice of materials for superstructure.
- 4.3. Materials and detail**
- 4.4. The approach to materials and architectural details was not discussed in great detail at this review. Paragraph 130 of the National Planning Policy Framework (2018) states: 'Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).'
- 4.5. In order to be consistent with this national policy, the applicant team and local authority should note Design South East's general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.

**Confidentiality**

If the scheme was not the subject of a planning application when it came to the panel, this report is offered in confidence to those who attended the review meeting. There is no objection to the report being shared within the recipients' organisations provided that the content of the report is treated in the strictest confidence. Neither the content of the report, nor the report itself can be shared with anyone outside the recipients' organisations. Design South East reserves the right to make the content of this report known should the views contained in this report be made public in whole or in part (either accurately or inaccurately). Unless previously agreed, pre-application reports will be made publicly available if the scheme becomes the subject of a planning application or public inquiry. Design South East also reserves the right to make this report available to another design review panel should the scheme go before them. If you do not require this report to be kept confidential, please inform us.

If the scheme is the subject of a planning application the report will be made publicly available and we expect the local authority to include it in the case documents.

Appendix 2

Report of the Coastal West Sussex Design  
Review panel, 63–77 Brighton Road.

15th March 2021

The design review meeting

Reference number	1574/020321
Date	2 <sup>nd</sup> March 2021
Meeting location	Online via Zoom
Panel members attending	Lorraine Farrelly (Chair), Architecture, Urban Design Steven Bee, Historic Environment, Public Realm, Urban Design Nick Hayhurst, Architecture, Urban Design
Panel managers	Timothy Cantell, Design South East
Presenting team	Tim Waller, Waller Planning Christine Thomson, Waller Planning Martin Bryant, Bryant and Moore Architects Ana Basch, Bryant and Moore Architects Catherine Ritson, Allen Pyke Associates Vincent Friedlander, Allen Pyke Associates Gemma Nelmes, Stantec
Other attendees	James Appleton, Adur & Worthing Councils Stephen Cantwell, Adur & Worthing Councils Richard Small, Adur & Worthing Councils Rob Wheatley, Camey Bee (London) Ltd. Milton Nutt, Camey Bee (London) Ltd. Chris Lamb, Design South East Sarah Brown, Design South East
Site visit	This review was carried out during the Covid-19 outbreak in 2020-21. At the first review, the panel were familiarised with the site through a digital walk-around (in a similar fashion to that which would have been conducted on-site) and self-guided desktop study. At this review, a digital refresher site visit was shown. Also, the panel members are all familiar with this context and have previously visited Brighton Road and the Western Harbour Arm.
Scope of the review	As an independent design review panel, the scope of this review was not restricted.
Panel interests	Panel members did not indicate any conflicts of interest.

Confidentiality	This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.
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The proposal

Site location	63-77 Brighton Road, Shoreham-by-Sea
Local authority	Adur & Worthing
Site details	<p>This is a 0.685 ha. site housing an existing car dealership, on the Western Harbour Arm in Shoreham-by-Sea. The site is in Flood Zone 3. The site is bounded by the Brighton Road (A259) to the north and the River Adur to the south. There are a number of emerging development schemes that are consented, under construction or newly built in the local area, including the Free Wharf scheme, 540 homes adjoining the site on the east, which has recently gained planning consent. To the west, the adjoining Riverside Business Centre is not yet the subject of a redevelopment scheme.</p>
Proposal	<p>The proposal is for 183 homes: 80 one-bed and 103 two-bed units. There are 81 vehicular parking spaces (a parking ratio of 0.45) and 404 cycle spaces (2.2). On the Brighton Road frontage there is approximately 750sq.m commercial space at ground floor level.</p>
Planning stage	A full planning application is to be submitted.
Planning context	<p>The site is allocated for residential and commercial development in the Shoreham Harbour Joint Area Action Plan (JAAP), adopted October 2019. It is identified as site WH7. A Tall Buildings capacity study determined the site is unlikely to significantly impact key views to St Mary de Haura Church.</p>
Planning history	None relevant.
Planning authority perspective	<p>The local authority seeks the panel's advice on the proposal's quality in terms of scale, relationship to neighbours, public realm, open space, green infrastructure, distinctiveness, layout and uses, flood defences, the waterfront walking route and parking.</p> <p>The Council seek a contribution to a new waterfront route and comprehensive flood defences, multifunctional green infrastructure, enhanced coastal biodiversity and green spaces, as well as a new cycle route and mitigated air quality and noise impacts along Brighton Road (A259).</p>

Community engagement	No particulars given.
Previous review	<p>This scheme has previously been reviewed by the panel on 15th September 2020. Following that review our report stated that there were fundamental concerns about the scheme. A comprehensive landscape and public realm strategy and studies to show how the form, height, mass and architecture responded to neighbouring developments were sought. More work on the housing layouts, form, mass and architecture were needed to achieve an acceptable scheme offering a positive human experience.</p>

Summary

This proposal is an important component of the overall vision for the Western Harbour Arm, which has been brought forward proactively by the Council. There has been progress since the first review on parking and landscape. However, the panel's previous concerns about the design quality of the scheme and making it a more liveable place have not been addressed: regrettably, we still have fundamental concerns about the scheme design and the design process. It remains a dense scheme with a public realm dominated by substantial surrounding blocks. Further design development needs to take place that considers the number of blocks and how their footprints could be reduced: the spaces must be designed to work harder, and the quality of the architecture and the homes refined.

Key recommendations

1. Develop a more convincing response to the potential future character of the Western Harbour Arm in line with the Area Action Plan (AAP) that prioritises a positive human experience and local distinctiveness.
2. Clarify and develop how the form, height and mass are considered as a coherent architectural response to the nearby context through studies of near and mid-range views.
3. Re-consider the figure ground of the buildings, the balance between building and landscape and simplify the form, mass and architectural language.
4. Further develop the landscape and public realm strategy, in dialogue with the architectural strategy, to make the limited amount of space work to the best advantage of the scheme.
5. Change the housing layouts to reduce the number of single-aspect and north-facing homes and provide more generous balconies so as to increase the liveability and quality of the homes provided.
6. Demonstrate how the development creates a positive human experience at eye-level.

Detailed comments and recommendations

1. **Response to the first review**
  - 1.1. Some of the panel's previous concerns about the scheme have been allayed. We welcome the development of a clear landscape strategy, and the separation of parking and open space.
  - 1.2. However, the proposal still does not provide the positive human experience that we sought last time. The design team has responded to some of our points, but the form, mass and building layouts are largely unchanged. A significant amount of further design and development work to the proposal is still needed before a planning application is submitted.
  - 1.3. The applicant needs to do more to explain how this scheme is going to offer a good place to live and contribute to the quality and character of Shoreham.
2. **Relationship to the existing & emerging context**
  - 2.1 The character of the Western Harbour Arm is undergoing comprehensive change. We are therefore comfortable with an identity and architectural language distinct from the rest of Shoreham. However, we are not yet convinced the scheme's character is distinctive and complementary to emerging and newly built schemes.
  - 2.2 The Townscape and Visual Impact Assessment (TVIA) undertaken since the first review shows that the scheme would not have a significant impact in long views. The development will take its place among other schemes of comparable height and scale, and will not be prominent among them.
  - 2.3 Equally, we think the scheme is at the upper limit of what height could be accepted here. There should be no easing of the LPA's application of the policies of the Joint Area Action Plan. We suspect there has been some height and density inflation since the AAP was adopted. This scheme should not set a precedent for the height of a scheme on the adjacent site to the west - a reduction in height towards the town centre is policy.
  - 2.4 More work is needed to develop the form, height, mass and architectural response in the local context of neighbouring developments, including visualisations of near and mid-range views. The architecture should be described in three-dimensional, spatial terms, using physical and digital 3D models that include this context. Elevations and materials should develop the narrative being created by other schemes in the vicinity.



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- 2.5 The closer-range TVIA we ask for should illustrate the experience of the scheme in public ground-level views from Brighton Road and the riverside route. It would also be good to depict the experience for those using the route and spaces within the scheme.
- 2.6 The red-line application boundary encloses an awkward shape for development that constrains the plan, form and massing. This could be helped by integrating the redevelopment of the Riverside Business Centre with this site.. We would welcome further exploration by the applicant and local authority of such land assembly. Such constraints on other proposals along Brighton Road have hindered the application of Joint Area Action Plan policies.
- 2.7 We commend the dialogue established with the owners to the east. The opportunity to collaborate on boundary conditions could improve east-west permeability and make the most efficient use of land. The unfortunate image shown of a railing between landownership and two separated strips of land will, we hope, be superseded soon by shared areas, maybe under joint management.
- 2.8 The permeability of the scheme north-south, forming a clearly public connection between the Brighton Road and the River Adur, is a public benefit.
- 3. Architecture, density, form, mass, & layout**
- 3.1 The architectural proposal as a whole in terms of form, footprint, language and materials requires further design development. The clarity and legibility of the blocks and how they sit together is the key issue, not height *per se*.
- 3.2 The balance of built form to open space was questioned at the first review: this has not been developed and remains a significant cause of concern. Smaller building footprints would facilitate wider and more light-filled external spaces that can be of a higher quality and provide a wider range of recreational functions. The ratio of building footprint to the width of spaces is high and gives rise to uncomfortable spaces in terms of shading and microclimatic conditions. We did not see detailed study of these factors.
- 3.3 The design team should step back and look afresh at the layout and massing. It appears that a layout has been established and the landscape designed around it. A landscape-led approach to place-making would have engendered a more coherent and high-quality scheme, and could still do so.
- 3.4 A reduction in quantum would help, though we acknowledge this could compromise viability. Three blocks, not four, would enable a scheme with better open space. It might be worth, for instance, exploring moving block 2 to the west to meet block 1 that would create a more generous and welcoming landscape space in the centre of

- the site. The impact of a longer elevation on Brighton Road would need to be tested (though this would not be as long as it was in the first iteration in March 2020, as shown in the last DRP). We acknowledge that this would result in the loss of the lawn currently located between blocks 1 and 2. However, we feel that this would not be pleasant to be in and that better space could be provided elsewhere.
- 3.5 A more refined, simpler plan with fewer setbacks should be brought forward. This would help with overall coherence and appearance. The treatment of upper levels on the Brighton Road could be revisited. We do not agree that it is necessary to be less conspicuous on the skyline. The set-backs could be made part of the building, giving a cleaner, less fussy form. The road frontage should have more continuity and consistency of materials and form. The elevations should have a similar language on the front and sides on Brighton Road.
- 3.6 While blocks 1, 2 and 3 should form a group and accept the discipline of height and scale in the AAP, block 4 could be more distinct with an interesting form and elevations of its own.
- 3.7 We favour a simpler and clearer palette of materials; the scheme may be trying too hard in this regard at present and in doing so reducing its architectural quality. Grey metal with brick is not a good in combination (it would need a lot of maintenance). We hope to see 'real' brick, not panels. Brick fits with the local context.
- 3.8 The building form and mass should be reviewed in tandem with improved internal layouts for better liveability. There are too many north-facing, single aspect homes and the tight internal corridors with no natural light would not be welcoming. The typical floor plate of block 4 especially calls for rationalisation; the entrance to this block is awkward and could be improved. The combination of better-quality homes and a more efficient internal layout to Block 4 could enhance viability.
- 3.9 Some balconies are too small to be useful. The angled balconies on the road frontage in particular may prove to have little worth. Bearing in mind typical wind conditions in this exposed location, we would suggest more balconies are inset. Generally, we would encourage more consideration of views out from habitable rooms.
- 3.10 There should be more cross ventilation. Opportunities for high-level glazing can help both ventilation and amenity, while avoiding overlooking.
- 4. Landscape and public realm strategy**
- 4.1 The panel sees a good start with the landscape and public realm strategy. We support the approach to creating character areas. Nonetheless, the landscape and buildings need to be more clearly integrated. The landscape proposal should inform the

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	surrounding building character, form, massing and layout of the development. There are further ways the strategy could be strengthened.	
4.2	The riverfront setting is the great asset of the scheme and the spatial quality of this part of the proposal should be described in detail. The waterfront would benefit from a variety of experiences for those walking and cycling along the river: this scheme could add to an interesting rhythm, variety and attractiveness on the route.	
4.3	The placing of communal areas and play areas for daylight and shade is important as is having them where they can bolster the vibrancy of the public realm as a whole, rather than being tucked away.	
4.4	There is scope for public art to add interest on the north-south route: possibly the harbour history could be interpreted and/or expressed in artistic form.	
4.5	While supporting the exclusion of cars from the public realm, there will still be traffic from refuse/recycling and emergency vehicle, deliveries, taxis, picking up/dropping off etc. The shared surfaces must be designed primarily for pedestrian access and amenity. Similarly, the routes for cycles need to be designed to minimise conflict with pedestrians, not least as cyclists arrive at the riverfront.	
5.	<b>Sustainability</b>	
5.1	Our standard guidance at planning application stage is that the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy and optimise the use of renewables in order to align with the local and national zero carbon policies and targets. This strategy should be informed by detailed modelling work informed by respected calculation methods.	
5.2	In light of current climate issues, at an early stage in the development of proposals, we welcome commitments made to sustainable measures, such as net-zero carbon and carbon-neutral targets, with impact on the proposal clearly communicated, for example through the choice of materials for superstructure.	
5.3	We want to see district heating come about as a sustainable solution (plus the removal of the air source heat pumps on the skyline).	
5.4	The amount of cycle parking is commendable. We also welcome the scheme's provision for car clubs.	

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6.	<b>Detail</b>	
6.1	The approach to materials and architectural details was not discussed in great detail at this review. Paragraph 130 of the National Planning Policy Framework (2018) states: 'Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).'	
6.2	In order to be consistent with this national policy, the applicant team and local authority should note Design South East's general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.	
<hr/>		
<b>Confidentiality</b>		
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The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.		



## Appendix 3

Report of the Coastal West Sussex  
Design Review panel, 63-77  
Brighton Road.

Reference number	1717/210921
Date	21 September 2021
Meeting location	Online via Zoom
Panel members attending	Lorraine Farrelly (Chair), Architecture, Urban Design
Panel managers	Xan Goetzee-Barral, Design South East
Presenting team	Tim Waller, Waller Planning Christine Thomson, Waller Planning Ana Basch, Bryant and Moore Architects Graham Randall, Bryant and Moore Architects Vincent Friedlander, Allen Pyke Associates Catherine Ritson, Allen Pyke Associates Rob Wheatley, Camey Bee Milton Nutt, Camey Bee Mike Lodge, STX Group
Other attendees	James Appleton, Adur & Worthing Councils Stephen Cantwell, Adur & Worthing Councils Linda Amos, Adur & Worthing Councils Erin Christie, Design South East
Site visit	This review was carried out during the Covid-19 outbreak in 2020-21. At the first review, the panel were familiarised with the site through a digital walk-around (in a similar fashion to that which would have been conducted on-site) and self-guided desktop study. At the second and this review, a digital refresher site visit was shown. The panel member is familiar with this context and has previously visited Brighton Road and the Western Harbour Arm.
Scope of the review	As an independent design review panel, the scope of this review was not restricted.
Panel interests	Panel members did not indicate any conflicts of interest.
Confidentiality	This report is publicly available as the scheme is the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

## Appendices

Report of the Coastal West Sussex Design Review Panel

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## The proposal

Site location	63-77 Brighton Road, Shoreham-by-Sea
Local authority	Adur & Worthing
Site details	This is a 0.685 ha. site housing an existing car dealership, on the Western Harbour Arm in Shoreham-by-Sea. The site is in Flood Zone 3. The site is bounded by the Brighton Road (A259) to the north and the River Adur to the south. There are a number of emerging development schemes in the local area that are consented, under construction or newly built, including the Free Wharf scheme, 540 homes adjoining the site on the east, which has recently gained planning consent. To the west, the adjoining Riverside Business Centre is not yet the subject of a redevelopment scheme.
Proposal	Demolition of existing buildings, construction of 80no. 1 bedroom and 103no. 2 bedroom residential apartments and commercial development over 4 blocks between 5 and 9 levels, basement parking and raised deck, new highway access, flood defences, drainage infrastructure, landscaping and ancillary development. There are 82 vehicular parking spaces, of which 27 have electric vehicle charging points, and 404 cycle parking spaces.
Planning stage	A full planning application was submitted on 3 August 2021 (ref AWD/1473/21) and the scheme is now undergoing public consultation. The proposal is expected to be submitted to the planning committee for determination before the end of the year.
Planning context	The site is allocated for residential and commercial development in the Shoreham Harbour Joint Area Action Plan (JAAP), adopted October 2019. It is identified as site WH7. A Tall Buildings capacity study determined the site is unlikely to significantly impact key views to St Mary de Haura Church.
Planning history	None relevant.

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Planning authority perspective	<p>The local authority welcomes the flood strategy and the applicant's overall response to the flood risk. The frontages on the ground level have improved and the corner returns have a better relationship with the windows on the ends. A study recommended an undulation of the roofline on the riverfront and the local authority questioned whether this is being achieved by the current proposal. The eastern boundary appears piecemeal in its relationship to Free Wharf.</p> <p>The proposed large tree canopies are welcomed, however the local authority questioned whether these can be realistically achieved given the need for large and costly tree pits and the maintenance they would require. This raised concerns as to whether the proposal for trees would result in amendments to the planning application further down the line.</p> <p>The authority was concerned about the lack of a response to the public consultation. Whilst this may in large part due be to COVID restrictions, the applicant was encouraged to respond to the public feedback.</p>	
Community engagement	<p>No particulars provided.</p>	
Previous reviews	<p>This scheme has previously been reviewed by the panel on two occasions. Following the first review in September 2020 by a full panel, our report stated that there were fundamental concerns about the scheme. A comprehensive landscape and public realm strategy and studies was sought, showing the form, height, mass and architecture would respond to the neighbouring developments. More work on the housing layouts, form, mass and architecture was needed to achieve an acceptable scheme that offered a positive human experience.</p> <p>A second review was made in March 2021 with three panel members. Our report stated that whilst progress had been made in the proposals for parking and landscape, the concerns on design quality had not been fully addressed. The scheme remained dense with an overbearing massing. The panel recommended that the quantum of blocks was reconsidered, with a view to reducing the overall building footprint.</p>	

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Key recommendations from previous review (15/3/2021)		
1.	Develop a more convincing response to the potential future character of the Western Harbour Arm in line with the Area Action Plan (AAP) that prioritises a positive human experience and local distinctiveness.	
2.	Clarify and develop how the form, height and mass are considered as a coherent architectural response to the nearby context through studies of near and mid-range views.	
3.	Reconsider the figure ground of the buildings, the balance between building and landscape and simplify the form, mass and architectural language.	
4.	Further develop the landscape and public realm strategy, in dialogue with the architectural strategy, to make the limited amount of space work to the best advantage of the scheme.	
5.	Change the housing layouts to reduce the number of single-aspect and north-facing homes and provide more generous balconies to increase the liveability and quality of the homes provided.	
6.	Demonstrate how the development creates a positive human experience at eye-level.	



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Summary

The applicant and design team are applauded for the presentation and engagement with the planning authority. The scheme is critical to the development of the wider area and it is imperative that it acts as a seamless piece of townscape. The landscape design will be important in unifying and integrating the proposal with its wider context, in particular the proposed north-south route. The landscape is also a key opportunity for the scheme to present and celebrate its distinctiveness. As the scheme progresses, the design team should ensure this element of the proposal is fully resolved, whilst also considering frontages, materials palette and the internal layout.

Key recommendations

1. Continue to develop the relationship with neighbouring properties to ensure the building and landscape design is well integrated.
2. Ensure the landscape can be realistically achieved and maintained, in particular the north-south route that is critical to the development and wider context. Details of planting and maintenance as well as visualisations at different times of the day and the year, will aid in this.
3. Ensure the landscape proposal can be realistically achieved and maintained, in particular the north-south route that is critical to the development and wider context.
4. Progress the proposals for ground floor frontages, especially on Brighton Road and the proposed north-south link, and present these to members and the public accurately and realistically.
5. Minimise single-aspect, north-facing units.
6. Progress the materials palette to ensure the scheme's wharfside distinctiveness is celebrated.

Detailed comments and recommendations

1. Wider context
  - 1.1. It is encouraging that the applicant is engaged with the neighbouring properties. The concept of a promenade to link the scheme to its surroundings is welcomed, as this will better integrate the project and help its success. We encourage the applicant to continue to develop the relationships with adjoining properties as this will further benefit the integration of the proposed scheme into the broader context of the Shoreham Harbour development. It will also ensure that residents have a more seamless experience of the public realm.
2. Landscape
  - 2.1. The landscape proposal has progressed well and the design team is commended for its response to the comments from the previous review. The landscape design is critical in unifying the scheme and will provide it with a distinctive character. It will also play a role in mediating between the historic environment, including the wharfside and art deco buildings, and the emerging context of the proposed buildings and public realm. The proposed north-south link is successful and will assist a balance between buildings and landscape.
  - 2.2. The design team should consider how the distinctive character provided by the landscape can be achieved and realistically maintained, particularly the north-south route that is a key element of the urban design and public realm. More details regarding the proposals for and maintenance of planting, trees, shrubbery and materials will demonstrate how the outdoor spaces can be sustained as character areas in the development. Ensuring the quality of these spaces is integral to the experience if the scheme.
  - 2.3. The use of trees throughout the scheme is welcomed as this will help to mediate the building scale and create a more friendly and accessible environment.
  - 2.4. The visualisations provided are welcomed, however these appear somewhat misleading as they do not include deciduous trees. More images are required to illustrate the area at different times of year, from different points within and around the scheme; this will provide confidence about the character and quality of the proposed landscape spaces.
  - 2.5. The definition and description of outdoor spaces at night should also be illustrated through images, in particular the north-south route as this will become an important link to the town centre. Details of the street scene and types of lighting at high level should be specified to ensure accessible and safe outdoor spaces are provided at night.

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3.     **Massing and architecture**
- 3.1.   The planning authority has welcomed the applicant’s response to handling the scale of the development, achieved by stepping back of the buildings from the river front. The latest proposal is a more sympathetic response to the surrounding emerging context.
- 3.2.   An undulating massing and roofline across the surrounding developments is particularly important to ensure the scheme is well-integrated and will support the emerging context. The design team should continue to bear this in mind as the scheme progresses.
- 3.3.   The frontages on Brighton Road and the proposed north-south link are critical to the user experience and the definition of the outdoor spaces. These should be described in greater detail and clearly presented as the scheme progresses.
- 3.4.   The scheme has a wharfside appearance in terms of its massing and materiality, which draws on the distinctiveness of the location. The distinction and identity of the scheme is also defined by the relationship with the new public realm and the proposed landscape spaces. Further consideration should be given to the way this wharfside architecture will relates to the landscape spaces, as well providing consistency in terms of material palette of surfaces and street furniture. These details will add to the quality of the scheme.
4.     **Internal accommodation**
- 4.1.   Large balconies, more usable amenity space and access to roof gardens are welcomed, improving the residents’ experience.
- 4.2.   Single aspect, north-facing units are not conducive to a positive or healthy living environment and should be avoided. We understand this is not always possible due to the footprint of the building, but the design team is strongly encouraged to minimise their number.
5.     **Materials and detailing**
- 5.1.   The proposed palette of materials has been simplified since the previous review. The quantum of cladding has been reduced in favour of brick, which is welcomed, and the design team is encouraged to explore variations and combinations of alternative bricks. The use of materials local to this site, such as local bricks, will help to integrate the proposed buildings into the surrounding context.

- 5.2.   The planning authority expressed doubts as to how the distinctiveness of the scheme is expressed in the proposed materiality, particularly in the lower-level commercial units. The applicant should continue to engage with the planning authority with a view to resolve this issue.
- 5.3.   Paragraph 135 of the National Planning Policy Framework (2021) states: ‘Local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).’
- 5.4.   In order to be consistent with this national policy, the applicant team and local authority should note Design South East’s general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.

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Appendix 4

Exhibition Feedback and Responses

Feedback from Public Exhibitions	Applicant's Response
Do you have any comments on the appearance of the proposed buildings?	
The brown colours do not suit the marine location. Various shades of brown do not reflect the marine nature of Shoreham with the light reflected from the shades of blue water. Why not lighter to reflect sunlight and river?	Only one buff colour is proposed in the brick to be used in the buildings, in addition to a white brick, with timber details. The white brick would be similar to that being used in the Free Wharf development under construction next-door, and the white render of the Mariner's Point development. The buff brick is intended to provide some subtle variety and articulation to the building's appearance.
Much more thoughtful design than some of the recently proposed developments. Clearly height is still an issue, but hard to mitigate in such a high-cost site.	Noted. The buildings' height would be similar to those to be built at Free Wharf and on the former Civic Centre site, both at the road and river frontages, and at their highest points. The proposals would not conflict with the guidance in the Council's Tall Building's Study.
The proposed buildings look too tall, and they would be out of character with the local area.	The buildings would be of a similar scale and general character to other developments on adjacent sites which have either been built or which have planning permission. The character of this area is changing, following its allocated for redevelopment within the adopted Local Plan, in order to meet the need for new homes, on brownfield land close to the town centre. The alternative would have been to provide a greater amount of lower density housing on the edge of the towns, within the surrounding countryside, and this option was rejected during the preparation of the Local Plan due to its higher environmental cost.
Is there sufficient space between the roadside edge of the blocks and the kerb to have landscaping which will make a difference to air pollution and noise?	<p>There are very few services under the ground in this location, and the design team are confident that the landscaping shown on the drawings can be delivered. However, this will not have a direct effect on noise and air pollution.</p> <p>An Air Quality Assessment has shown that the very small effect the development could have on air quality will be more than mitigated by the provision of electric vehicle charging points, and EV car club spaces, to reduce local journeys by petrol and diesel vehicles. A Noise Assessment has also demonstrated that the proposed development would comply with local requirements in relation to noise.</p>
I like it! I like it not being boxy, with angled walls.	Noted.

Feedback from Public Exhibitions	Applicant's Response
Do you have any comments on the appearance of the proposed buildings?	
It should look more like a riverside/seaside town. Warehouse style, less square, with pitched roofs occasionally.	The proposed design is intended to echo the area's commercial history, with a nod to the traditional design of commercial wharf buildings. Care has also been taken to give the buildings variety in their appearance, including with rooftop gardens and visible planting. Pitched roofs were not considered to fit in well with this approach, and there would also be little space for them, due to the need to incorporate air source heat pumps, solar panels and green roofs.
Concern was expressed by a resident of Humphreys House (67 Brighton Road), that their flat and balcony may be overlooked from the proposed development.	Noted – additional privacy screens have been added to the eastern side of Block 3, to prevent direct views between the two buildings.
Do you have any comments on the design of the public spaces within the site?	
There are no childrens' play facilities / There is not enough play space for children.	There would be a childrens' play space within the development. There is also a childrens' play space across the road at the Ham recreation ground. These spaces would offer different types of play space, and cater for children of different ages.
Concrete walkways, generic flat development. Oppressive. Green space is crucial, should be less paving and more trees and shrubs that are sea and wind tolerant. The pictures look good but who will be responsible for the upkeep?	The public walking routes through the site are an important element of the proposals, which are also required by the Local Plan. They have been kept as clear as possible, by moving cars into an underground parking area. However, there is simply insufficient space to provide a large area of grass within the site. The Landscape Strategy explains how the public spaces within the site have been designed to provide variety and interest. The proposed tree and shrub species have been carefully selected for their suitability to the local climate, and the planting spaces have been carefully designed to ensure they would provide sufficient space for their roots, as well as irrigation, etc. A management company, paid for by a service charge on the new apartments, would be responsible for maintaining the landscape planting and all public areas within the site.
There are good spaces but they are not big enough.	The spaces are as large as is possible within the site.
Good that there is open access to the public and play space for children.	Noted.



Feedback from Public Exhibitions	Applicant's Response
Will the play area include children's play equipment such as swings etc?	The play space will include play equipment, including climbing frames. Further details of the play equipment can be controlled by the Council with a condition.
Good to see more trees – will they be that mature?	The Applicant is prepared to provide semi-mature trees, with space allowed for them to continue growing.
Do you think the proposed pedestrian routes will be useful to local people?	
It is very important to keep the river accessible and as visible as possible.	The proposed development will introduce public access to more of the river frontage than is currently available, and ensure that it would be prominently visible from within the site.
Need low level lights for evening/night, possibly with motion sensors very late at night for safety.	The lighting proposed, and shown in the new night-time images, has been designed to ensure it would both light the public spaces well, but also not adversely affect wildlife. Light spill will be minimised, and lights will be directly downward. Details of lighting can also be controlled by the Council with a condition.
As long as they are well maintained. Should be along A259/Brighton Road and Riverside.	The public areas within the site would be maintained by a management company. These routes would be both along Brighton Road and the riverside, with a further new route passing through the site and linking the two.
Do you think that there is a need for new homes in this area?	
No affordable homes are proposed. There is a need for homes that help people on the Council's waiting list. Various comments were received indicated that local residents would oppose the development if no affordable housing was to be provided.	At the first public exhibition we said that we did not at that stage know whether affordable housing could be provided. A Viability Assessment had shown that the development could not provide affordable housing, and this had been confirmed by the Council's own independent consultant. However, since that time the Applicant has entered into an agreement with a housing association, who have access to central funding for the provision of affordable homes from Homes England. Thanks to this, we are very pleased that the development is now able to provide a full policy-compliant 30% affordable housing.
There is need for housing suitable for families.	The Local Plan envisages that development on the application site and other similar sites in the Western Harbour Arm will provide smaller apartments rather than houses, and that these will tend to be smaller homes, and the proposed development would accord with the relevant policy requirements.

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Feedback from Public Exhibitions	Applicant's Response
We do not need more homes for extra people until the infrastructure is improved.	There is a high level of need for new homes. The proposed development would offset any impact on local infrastructure, such as schools and roads, by providing financial contributions for targeted local improvements, to accommodate the needs of its new residents. The proposals have also been designed to minimise their impact on the local road network, by seeking to restrict car parking, and providing car club spaces.
These will be expensive apartments, and many will be bought as 2nd homes.	The Applicants cannot generally control who buys the apartments. However, at least 30% of them will be affordable homes for local people.
Do you have any other comments on the exhibition proposals? Transport	
There is not enough car parking proposed, people will have cars and they will park on the roads. Traffic is already clogged up on the A259. In Mariner's point most people have their own car, several flats have 2 cars. Where will the other cars park?	The level of car parking has been carefully considered. The site is located within a short walk of the town centre and railway station, and on a good bus route, meaning that many journeys can and would be undertaken without the need to use a car. The development is designed to encourage walking and cycling, with high quality new pedestrian routes, an over-provision of cycle parking spaces (411 spaces), and the provision of land for a new cycle lane on Brighton Road. A number of car club spaces would also be provided, which are each equivalent to around 20 car parking spaces. This level of car parking has been accepted by the Highway Authority and District Council Officers as being acceptable.
WSCC parking guidance, if followed, would require 161 residential parking spaces and 8 disabled. Car ownership where affordable housing is provided is lower. This development has no affordable so parking should meet WSCC standards.	It is true that the WSCC parking standards would indicate a need for 161 spaces for this development; however these standards note that they can be varied where a site is in an accessible location where people may be more likely to walk, as is the case in this instance. There is also a need to minimise traffic on the local roads, which are congested, and the proposed development has been designed with the intention that car use will be minimised. This development would only generate a small increase in net vehicle trips over the existing use as a car showroom, and there would on average be less than one car per minute accessing or leaving the site in the morning and afternoon peak hours. As noted above, this level of car parking has been accepted by the Highway Authority and District Council Officers as being acceptable.



Feedback from Public Exhibitions	Applicant's Response
How many car club spaces will be provided? Where will they be parked?	It is envisaged that 8 car club spaces will be provided. These spaces would be provided within the basement parking area, along with other parking spaces. They would be labelled as such, and made accessible only to people who were members of the Car Club (this will be all households to begin with, as they will be provided with complementary membership and a £50 voucher for using the Car Club vehicles). The membership of the Car Club will also be open to other local residents living outside the development, with the intention that this will help to reduce car ownership in the wider area, and so help to reduce congestion on the local road network.
People who can afford these flats will be more prosperous and therefore more likely to have electric cars. Why are you providing only the minimum number of EV charge points – 33% of spaces? More electric charging spaces needed for both residents and visitors.	The proposed development will provide the level of EV parking required by the County Council's standards, which at the time of writing (in 2022) is for 37% of all spaces to have charging provision. In addition to this, all of the parking spaces will have passive provision, which means that the cables required would be put in place, and EV charging points could easily be retrofitted at a later date, as required.
Who will pay for the retrofitting of EV charge points?	The management company which will maintain the development will provide these over time, as the demand for them arises. They will be paid for by a service charge.
How will the allocation of Parking Spaces and EV charge points be done? Will it be first come first served?	Parking spaces will not be allocated to individual apartments, so as to allow the spaces to be used as efficiently as possible. Car parking and ownership will be monitored and managed through a Car Parking Management Plan for the site.
Has a parking survey been done of the area to see how many free spaces are available during the day and night?	An on-street parking survey of the local area has been undertaken and identifies a total occupancy of 62% of spaces over-night. During the AM period spaces were at capacity. The inclusion of Car Club Spaces and the Travel Plan measures will reduce car ownership and encourage a shift towards sustainable modes of travel.
Why are there no allocated visitor spaces? Where will people such as carers park?	It is anticipated that there will be sufficient space to accommodate visitors within the parking spaces proposed, which will not be allocated, so as to maximise their usefulness.
Your assessment assumes that people only use their cars for commuting to work and that they will then get the bus or train. Do you not believe that people use their cars for other activities especially if they are older, have children, want to do a big shop or access countryside for leisure?	People may use cars for a variety of purposes, and this has been taken into account in the preparation of the Transport Statement which accompanies the application. The site is located where people will be able to undertake many journeys on foot. In addition, the Car Club spaces provide additional flexibility and reduced ownership costs for residents, such as those who may seek the use of a car for a big shop or leisure use, as they could simply book one of these, rather than needing to keep a separate car themselves.

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Feedback from Public Exhibitions	Applicant's Response
Your assessment assumes that people only use their cars for commuting to work and that they will then get the bus or train. Do you not believe that people use their cars for other activities especially if they are older, have children, want to do a big shop or access countryside for leisure?	People may use cars for a variety of purposes, and this has been taken into account in the preparation of the Transport Statement which accompanies the application. The site is located where people will be able to undertake many journeys on foot. In addition, the Car Club spaces provide additional flexibility and reduced ownership costs for residents, such as those who may seek the use of a car for a big shop or leisure use, as they could simply book one of these, rather than needing to keep a separate car themselves.
What proof can you provide that travel plans work?	The Travel Plan has been prepared by specialists with expertise in these matters. It will also be overseen by the Highway Authority, and its success will be monitored. If necessary, changes can be made over time to improve its performance.
Transport links, such as cycle routes, need to be improved before more flats are built.	The proposed development would help to improve local cycle routes, including within the site and at its frontage with Brighton Road.
Access to cycle parking should be user friendly, preference for Sheffield stands, no wheel bending manoeuvres to get cycles in and out of storage.	Only Sheffield stands are proposed.
Do you have any other comments on the exhibition proposals?    Energy Supply	
Heating will be supplied by an air source heat pump. Will each flat have a separate meter?	Yes, each apartment will have a separate meter to allow for individual energy bills. The air source heat pumps will only be required until such a time as the planned Shoreham Heat Network becomes available. Either way, hot water for use in the apartments and for heating will be provided communally, but billed individually.
Where will the electricity supply come from, will electricity be generated on site?	There may be some solar photovoltaic panels on the roofs of the building, in the event that the air source heat pumps are not required (if a connection can be made to a Shoreham Heat Network). However, there is limited space available, and the majority of the development's electricity needs will be met from the National Grid.



Feedback from Public Exhibitions		Applicant's Response	
Do you have any other comments on the exhibition proposals?   Air Quality			
Air Pollution – Your analysis seems mostly concerned with levels of NO2. Yet the WHO has stated that PM2.5 are particularly dangerous and can get into every organ in the body. They have recently lowered the annual safe level to 5mg/m3. So why have you ignored particulate levels? During the last week levels of PM2.5 air pollution have reached levels of 17,21 25,22 and were predominantly around 10. Can you appreciate that any addition to air pollution from more vehicles resulting from another new development give local residents great cause for concern? This is already an air quality management area.		The Air Quality Assessment which has been provided with the application does consider the level of PM2.5 in the local area, and the effect that the proposed development would have on these levels. It finds that the proposed development would generate levels of emissions which would fall below the levels required by the National Air Quality Objectives. Moreover, the parking strategy seeks to minimise car use, and promote the use of electric vehicles, as noted above. In addition, the site is outside of the designated Air Quality Management Area.	
Has anyone modelled the effect of all the new buildings with the wind and consequently pollution.		Yes, the Air Quality Assessment considers the potential for adverse effects on air quality Brighton Road, in conjunction with the proposed development on the former Civic Centre site. This concludes that whilst the presence of the two developments opposite one another could raise the level of air pollutants in the immediate area, these would remain below the level required by National Air Quality Objectives.	
Do you have any other comments on the exhibition proposals?   Drainage, Sewage and Flooding			
Do you have evidence that foul waste outflows for the new development will not exceed that which currently exists for the site, as required by Southern Water.		Yes, Southern Water have been consulted on the proposed development, and they have confirmed that capacity exists within the local sewer network to accommodate the proposed development.	
It is hard to believe that the foul waste output for 183 homes and possibly over 300 residents will be less or no more than is currently experienced for this site. Are you certain of your figures?		Yes, it is proposed to attenuate foul and surface water within the site, and only allow it to outfall to the sewer at the same rate that it currently does. This approach has been accepted by Southern Water.	
The neighbouring Free Wharf site experienced high levels of ground water which caused construction difficulties. They had to obtain an Environment Agency licence to pump 3m cubic metres of ground water a year into the harbour to make the ground acceptable for construction, particularly for below ground car parking. Are you aware of this, particularly as your Flood Risk Assessment shows that groundwater level testing shows a similar situation for the Frosts site?		Yes, this has been taken into account in the design of the proposed surface water drainage network, and the design of the semi-basement which will accommodate the car park.	

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Feedback from Public Exhibitions		Applicant's Response
Do you have any other comments on the exhibition proposals? Drainage, Sewage and Flooding		
Are the materials used at parking and ground floor level flood resistant and to what height?		The basement and buildings would form the flood barrier required by the Local Plan, and they would be constructed from materials capable of serving this function. A flood barrier will be provided to a height of 5.6m AOD, this being the level of the podium deck, which is required to allow safe egress for residents, above the level of anticipated flood water.
Concerned about how the likely flooding will affect the flow of sewage.		Valves within the relevant pipework will ensure that sewage cannot flow out in the event of a flood.
Do you have any other comments on the exhibition proposals? Contribution to Infrastructure		
Given that your calculations state that this development is not financially viable (no affordable housing) will there be money to make a substantial and essential S106 contribution to local infrastructure.		Yes, the Viability Appraisal reached this conclusion only after account had been taken of the need to provide s106 obligations to mitigate the effect the new residents would have on local infrastructure. It is intended that all justified contributions will be provided.
There is a shortage of doctor's surgeries, dentists, school places and essential services are under significant strain.		The effect which the development would have on these services will be addressed through appropriate contributions, in accordance with Government policy and the legal tests within the Community Infrastructure Levy Regulations.
Do you have any other comments on the exhibition proposals? Commercial Units		
Who will use the commercial units? The units at Mariners Point have remained empty since they were built.		It is anticipated that the commercial units will be placed in the new use class "E", which covers a variety of uses including retail, cafés and restaurants, offices, crechés and health centres. This would allow these spaces to change between the various uses in the future without the need for a further planning permission. Much of the space is expected to be provided as office accommodation to allow people to have a quiet space to work from home, with the need for this space expected to be generated in large part within the new apartments within the site. There may well also be a café, quite possibly in the suitably sized unit on the river frontage. One of the Brighton Road units would be reserved for use as a concierge service, where packages could be delivered for residents; this would help to prevent the need for delivery vehicles to enter the site to reach Block 4.



Design and Access Statement  
Land at 69–75 Brighton Road,  
Shoreham-by-Sea

Appendices

Feedback from Public Exhibitions	Applicant's Response
Do you have any other comments on the exhibition proposals? Other comments	
Will you be publishing a list of numbers attending the consultation and the comments? Will there be another publicised event? Venue was difficult for accessibility.	A further public consultation event is now planned, as noted above. This will be held in the Shoreham Centre, which will hopefully be more easily accessible, as it is located within the town centre.
Your letter to residents stated that Councillors were consulted. Can you elaborate on how many were consulted and were they only of the council majority party?	Following consultation with the Council's Officers, it was agreed to invite the local Ward Councillors, the Leader of the Council, and the Chair and Vice-Chair of the Planning Committee to the exhibition.
The site is extremely expensive to develop, meaning the flats will be expensive in turn. Perhaps the site is not suitable for development and other areas should be considered where build costs are more acceptable.	The cost of the affordable apartments are fixed, and can be delivered in accordance with the fixed income stream to be provided by the registered affordable housing provider. The market housing will need to be sold on the open market, and the Applicant has undertaken expensive research into both the cost of the build and local sales values, which means that they are confident the development will be financially viable.
Big mistake to not have complete storage space in all flats. If some flats are "too small" to have fitted cupboards, then they are too small.	All of the apartments will meet the size requirements set out in the Government's Technical Housing Standards. This relates to a number of matters, including not only the overall floor area for each apartment, but also the size of habitable rooms, and storage space.
If the underground parking space doesn't fill the whole area of development, wouldn't it be useful to have the complete area made available for other uses. Maybe a gym or swimming pool?	The underground parking space is as large as it can feasibly be, whilst also providing the gradual slope required to the Bright on Road Frontage, and the river frontage, with the raised podium in the middle of the site. The height of the road frontage and riverside walk are dictated by existing levels and the need to tie in to the surrounding developments, whilst the height of the podium is dictated by flood risk and the Environment Agency's requirements.
Would pets be allowed in the flats? This is a key consideration for older lonely residents.	The Applicant is not aware of any reason why pets would not be permitted within the apartments.
How will residents do their laundry? Are you installing tumble-driers, using excessive electricity?	There will not be a central laundry, it will be for the occupants of individual apartments to keep a washing machine / tumble dryer, or find an alternative option.

