



Addendum to the Sustainability Appraisal (SA) of the Adur Local Plan

Proposed Main Modifications

June 2017

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1 INTRODUCTION

- 1.1 The Adur District Local Plan was submitted for examination in October 2016. Hearing sessions took place in January and February 2017 as part of the examination. A 'Preliminary Findings' letter (ID-7) was subsequently received from the Inspector in May 2017. This set out some initial conclusions and invited the Council to submit Main Modifications in light of the discussions during the Hearing sessions and the Council's proposed main modifications (CD07-04A) submitted to the Planning Inspector with the Submission Adur Local Plan in October 2016.
- 1.2 In accordance with European and national legislation, planning documents such as the Local Plan must be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). This report satisfies that requirement by considering the impact of the Main Modifications proposed by the Council on the Sustainability Appraisal of the Adur Local Plan. It builds on the sustainability appraisal work carried out during the production of the Adur Local Plan (see below) and forms an addendum to the Sustainability Appraisal / Strategic Environmental Assessment (hereon referred to as the Sustainability Appraisal) submitted alongside the Local Plan for examination in October 2016.

2 BACKGROUND AND CONTEXT

- 2.1 Adur District Council has prepared a Plan that will, once adopted, provide the planning policy framework to guide development in Adur up to 2032. There have been several stages in preparing the Adur Local Plan. The table below sets out the main stages and also indicates the accompanying stage of the Sustainability Appraisal process which has been prepared to inform it.

Table 1 – Local Plan / SA Production Process

Local Plan Production Stage	Sustainability Appraisal Production Stage	When Published
	Scoping Report	June 2011
Core Strategy Housing and Employment Options	Sustainability Appraisal and Strategic Environmental Assessment of the Core Strategy Housing and Employment Options.	June 2011
Draft Adur Local Plan 2012	Draft Adur Local Plan SA Report	September 2012
Revised Draft Adur Local Plan 2013	Revised Draft Adur Local Plan SA Report	September 2013
Proposed Submission Adur Local Plan 2014	Proposed Submission SA Report	September 2014
Proposed Amendments to the New Monks Farm Allocations within the Proposed Submission Adur Local Plan 2015		December 2015
Amendments to the Proposed Submission Adur Local Plan 2016	Amendments to the Proposed Submission SA Report	March 2016
Submission Adur Local Plan 2016	Submission SA Report Proposed Major Modifications Sustainability Appraisal Addendum	October 2016

3 LOCAL PLAN MODIFICATIONS

- 3.1 Since the submission of the Adur Local Plan to the Secretary of State, there have been a number of changes suggested to the text of the Plan. Many of these changes have been minor corrections or for clarification where as some have been more major and may potentially alter the outcomes of a policy. These more significant modifications are called Main Modifications. There have been two sets of Main Modifications:
- CD07-04 Revision A: Major Modifications Proposed, Amended 31 Jan 2017 – these modifications were proposed by the Council and are mainly comprised of corrections of drafting errors, clarifications, and evidence updates.
 - ID/7: Main Modifications & Inspector's Preliminary Findings (May 2017) – these modifications have been requested by the Planning Inspector and arose primarily through the Examination Hearings but also include a number of the modifications proposed by the Council in CD07-04A (mentioned above). These modifications are set out in Table 2 below.
- 3.2 In accordance with the regulations, the Council will invite representations which will be forwarded to the Inspector to consider in the preparation of his final report on the Adur Local Plan.
- 3.3 The table of Main Modifications below (Table 2) also has two columns indicating the implications of the modification for the SA and considers whether the Main Modification requires Sustainability Appraisal. Where it is considered that a Sustainability Appraisal is required, a detailed assessment of the Modification against the Sustainability Framework (as set out in section 5) has been undertaken.

Table 2: Proposed Modifications and SA Implications

Inspector's MM number	Policy/Para of Submitted Local Plan	Library Reference/Previous document (Council) ref no:	Modification summary	Proposed Modification to Local Plan (deleted text shown as struck-through and additional text shown in bold and underlined)	Inspector's Reason	SA Implications	SA Required
MM1	Policies 2,3,4 and 8, table 1 and in several parts of the supporting text	CD07/4A	Update document with regard to new end-date of 2032; household projections; OAN; and housing supply figures	<p>O1: To deliver a minimum of 3609 <u>3718</u> dwellings up to 20342</p> <p>Policy 2: Up to 20342</p> <p>Heading: <u>HOUSING PROVISION 20342</u></p> <p>Para 2.13: The most up-to-date work on OAN, and that which is used in this Local Plan, is the Objectively Assessed Need for Housing: Adur District 2015 study <u>Objectively Assessed Housing Need Update 2016</u></p> <p>Para 2.14: This 2015 <u>2016</u> study uses an updated set of demographic projections, taking account of information including 2012 <u>2014</u>-based Sub-National Population Projections (March 2014 <u>May 2016</u>) and the 2012 based Household Projections (February 2015 <u>July 2016</u>). It also takes account of the Government's Planning Practice Guidance published in 2014. This study supersedes all previous Objectively Assessed Need Assessments.</p> <p>Para 2.16: In terms of Adur's Objectively Assessed Needs the study recommends the delivery of 294 <u>325</u> dwellings per annum 5820 <u>6,825</u> dwellings over the Plan period). This represents 'demand' for new housing.</p>	Justified	<p>The increase in the plan period is a procedural issue and will not affect the strategy of the Plan or the SA findings.</p> <p>While the housing provision figure in policy 3 has changed slightly from 3,609 (up to the year 2031) dwellings to 3,718 dwellings (up to the year 2032) as a result of SHLAA updates and updated housing completion figures, this works out as a decrease of 3 dwellings per annum which is negligible and would not warrant a new SA of the</p>	No

				<p>Para 2.16A: The OAN 2016 assessment of housing need suggests that for C2 uses such as residential care and nursing homes there is a potential need for 29 38 bedspaces over the plan period 2011-20342 which equates to 1-2 per annum.</p> <p>Para 2.17: It indicates that, on brownfield sites, 254 294 (net) dwellings could be delivered.....</p> <p>Para 2.18: ...as follows:</p> <ul style="list-style-type: none"> • <i>Dwellings completed since 1 April 2011....</i>A total of 559 528 net new homes have been completed between 1st April 2011 and 31st March 2016 2015. • <i>Number of dwellings identified through existing planning permissions (commitments)....</i>A total of 439 326 (net) additional homes will be provided through existing planning consents. <p>Para 2.19:....in order to avoid double counting the remaining 970 (rounded) 968 dwellings....</p> <p>Para 2.20: this clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of 5820 6,825 dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of 4,296 3291 dwellings.</p> <p>Para 2.20: By assessing these various sources of housing supply, Table 1 below demonstrates that 2638 2529 dwellings can be..... This clearly indicates that, when measured against Adur's Objectively Assessed Needs figure of 5820 6,825 6,825 dwellings over the Plan period, the amount of residential development that can be delivered on brownfield sites results in a considerable shortfall of 4187 4,296 3291.</p> <p>Para 2.22: ... Taking these greenfield sites into account the Plan can deliver 3609 dwellings (172 180 dpa), leaving a shortfall of 2211 3,216 3,216 dwellings.</p>	<p>policy.</p> <p>It is also noted that the OAN has increased from 5,820 dwellings over the plan period to 6820 dwellings over the plan period due to an updated Adur OAN study. This issue is considered further at paras 7.23-7.24 of this SA addendum.</p>	
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Para 2.22: ...Taking these greenfield sites into account the Plan can deliver **3718** ~~3609~~ dwellings (**177** ~~dpa~~ **172** ~~180~~ dpa), leaving a shortfall of **3107** ~~3246~~ dwellings.

Table 1 - Housing supply over the Local Plan period 2011-2034

Sources of Housing Supply	Number of dwellings
Dwellings completed (net 2011- 2016 2045)	559 528
Existing commitments (large and small sites where planning permission has been granted)	439 326
Sites identified in the SHLAA (net) 2016 2045	254 294
Shoreham Harbour Broad Location	970 968
Total housing Supply (Delivery Target) 2011-2034	3718 3609 (annual target) 177 172 180

Para 2.23: Consequently the Local Plan is not able to meet the full objectively assessed housing needs figure of ~~5820~~ **6825** dwellings.

Policy 3: Housing Provision

Over the period 2011-2034 a minimum of **3718** ~~3609~~ dwellings will be developed in Adur, as follows:

- **1538** ~~1429~~ within the built up area of Adur

Para 2.24: The figures in Policy 3 above equate to an

				<p>annual average of 177 172 180 dwellings per year over the 201 year plan period.</p> <p>Policy 4: up to 20342 at the following locations: Policy 8:...within Adur District during the plan period to 20342.</p> <p>Policy 8: ...provided up to 20342.</p> <p>Para 4.27: ... The Objectively Assessed Need (OAN) for Housing: Adur District (2015) report <u>together with the Objectively Assessed Housing Need Update 2016 (which uses the rebased 2014 Sub-National Population and Household Projections)</u> builds on this work...</p>			
MM2	After para 2.24	ALP/025/A	Refer to the intention of undertaking at least a partial review of the document within 5 years	<p>New paragraph after 2.24:</p> <p><u>The Adur Local Plan will be reviewed or partially reviewed within 5 years.</u></p>	Justified and consistent with national policy	This modification relates to a procedural matter which does not alter the overall strategy or policies within the Plan.	No
MM3	After para 2.24	ALP/025/N	Include a reference regarding where the housing trajectory can be found	<p><u>The National Planning Policy Framework requires local authorities to prepare a housing trajectory to illustrate the expected rate of delivery for the Plan period. The Adur housing trajectory that accompanies this Local Plan can be found in the Council's Annual Monitoring Report 2016. It is based on the housing monitoring position at 1st April 2016 (completions and commitments) and the Strategic Housing Land Availability Update at 31st October 2016. The trajectory will be monitored and updated on an annual basis through the Annual Monitoring Report published on the Council's website.</u></p> <p>New footnote: https://www.adur-worthing.gov.uk/adur-ldf/annual-monitoring-report/</p>	Justified and effective	The purpose of this modification is to provide clarity regarding the location of the housing trajectory. It does not alter the overall strategy or policies within the Plan.	No
MM4	Policy 4	ALP/025/F	Clarification of employment floorspace figures	To facilitate regeneration and ensure a sustainable economy, a total <u>minimum</u> of approximately 41,000 square metres of land will be allocated for appropriate	Positively prepared and justified	This involves a change to the policy and	Yes

			by reference to 'minimum'	employment generating uses in Adur up to 2034 2 at the following locations: <ul style="list-style-type: none"> · Shoreham Airport (approximately a minimum of 15,000 sqm) · New Monks Farm (approximately a minimum of 10,000sqm) · Shoreham Harbour Regeneration Area (approximately a minimum of 16,000 sqm within Adur) 		could result in a higher level of employment floorspace in the district. An SA is therefore required to consider the impact.	
MM5	Policy 4	ALP/025/G	Delete reference to 'provision of new...'	Policy 4: Planning for Economic Growth In addition to the above provision, additional employment floorspace will also be achieved through redevelopment, intensification, and change of use to employment, and provision of new employment sites	Justified	Although this would result in a change to the policy, the provision of new employment sites is already addressed in the policy through the proposed allocations at New Monks Farm and Shoreham Airport and the broad location at Shoreham Harbour. This part of the policy is therefore deemed unnecessary and its deletion would have no impact on the conclusions of the Sustainability Appraisal.	No.
MM6	Policy 5	CD07/4A	Clarification regarding	The Withy Patch Gypsy and Travellers site should be relocated, to allow for the delivery of the new	Justified	The purpose of this change	No

			roundabout on the A27	roundabout access onto the A27 , and increased in size. The new site should be built at a higher level to reduce flood risk and to take the site out of Flood Zone 3. This will enable the provision of additional pitches in the future to meet identified needs.		is to provide greater clarity regarding the relocation of the Withy Patch Travellers site. This additional text would have no impact on the conclusions of the Sustainability Appraisal.	
MM7	Policy 5	ALP/025/P	Clarification regarding eastern boundary, stipulating that any amendment to the proposed boundary must be fully justified	<u>The eastern boundary of the Built Up Area at New Monks Farm as shown on the Policies Map is indicative. The final boundary will be determined at the planning application stage, having regard to landscape, drainage and viability considerations. However, any amendments to the boundary currently shown on the Policies Map must be based on a clear and convincing justification.</u>	Justified	The purpose of this change is to provide some degree of clarity regarding the indicative boundary. This indicative text would have no impacts on the conclusions of the Sustainability Appraisal.	No
MM8	Policy 5	ALP/025/F ALP/025/P	Refer to 'minimum' number of dwellings and employment floorspace	<u>A minimum of</u> 600 homes, 30% of which are to be affordable, providing a mix of types and tenures in accordance with identified needs.Approximately <u>A minimum of</u> 10,000sqm of appropriate employment generating floorspace.	Positively prepared and justified	This modification to the policy could result in a higher level of housing and employment floorspace at New Monks Farm. An SA is therefore required to consider the impact.	Yes

MM9	Policy 5	ALP/025/Q-T	Refer to minimum hectarage of 28ha for Country Park	<ul style="list-style-type: none"> A Country Park and informal recreation (approx. a minimum of 28 hectares). 	Justified	This change to the policy could result in a larger country park at New Monks Farm. An SA is therefore required to consider the impact.	Yes
MM10	Policy 5	ALP/025/Q-T	Refer to drainage requirements	Developers will need to work with Adur District Council, West Sussex County Council and the Environment Agency to ensure that tidal and fluvial flooding as well as surface water and groundwater flooding are adequately mitigated without worsening flood risk elsewhere. A Flood Risk Assessment (FRA) will be required at the planning application stage. The FRA must take account of and seek to facilitate relevant recommendations of the Lancing Surface Water Management Plan and must also set out a strategy for the long term management and maintenance of drainage on the site.	Justified	This change to the policy has the potential to improve flood risk on the site over the long term and should be re-assessed via SA.	Yes
MM11	Policy 5	ALP/025/Q-T	Require up-to-date ecological data	...A site wide landscape and ecological management plan that is informed by up to date ecological information to be produced and implemented to the satisfaction of the local planning authority to ensure the long-term maintenance of retained and newly created on-site habitats.	Justified	While the addition of this wording is positive, the SA was initially undertaken with an assumption that any ecological management plans for the site would be up to date. Therefore, this policy change would have no impact on the conclusions of the SA.	No
MM12	Policy 6	CD07/4A	Refer to road	...A27 Sompting Bypass/ Upper Brighton Road (Lyons	Justified	This	No.

			improvements at A27/Dankton Lane junction	Farm junction), A27/ Dankton Lane junction , and enhancement of the traffic calming scheme in West Street.		modification to include improvements to the A27/Dankton Lane junction would have no effect on the outcome of the Sustainability Appraisal. Such junction improvements do not relate directly to any of the Sustainability Objectives.	
MM13	Policy 6	ALP/025/L	Refer to 'minimum' number of dwellings	<ul style="list-style-type: none"> Approximately A minimum of 480 dwellings at West Sompting..... 	Positively prepared and justified	This modification to the policy could result in a higher level of housing at West Sompting. An SA is therefore required to consider the impact.	Yes.
MM14	Policy 6	ALP/025/M	Refer to seeking an extension of the SNCI	The development must safeguard, and enhance, and seek the extension of the Cokeham Brooks Site of Nature Conservation Importance"...	Justified	While this modification seeks to clarify that an extension to the SNCI will be sought, the supporting text already refers to seeking to extend the SNCI and the policy currently refers to	No

						delivering a nature conservation area to the north of the existing Cokeham Brooks SNCI. As a result, the Sustainability Appraisal already makes reference to this area potentially being enhanced and, as a result, it is not considered that this change would have an impact on the conclusion of the Sustainability Appraisal.	
MM15	Policy 6	ALP/025/M	Require up-to-date ecological data	A site wide landscape and ecological management plan <u>that is informed by up to date ecological information</u> to be produced and implemented to the satisfaction of the local planning authority to ensure the long-term maintenance of retained and newly created on-site habitats.	Justified	While the addition of this wording is positive, the SA was initially undertaken with an assumption that any ecological management plans for the site would be up to date. Therefore, this policy change	No

						would have no impact on the conclusions of the SA.	
MM16	Policy 6	CD07/4A	Refer to contributions through CIL	<p>.....Appropriate mitigation of any issues raised through these assessments is to be secured.</p> <p>...The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.</p> <p>....and upsizing purposes.</p> <p>All elements are to be secured through s106/planning conditions. <u>The elements identified above, and any other infrastructure requirements are to be secured through CIL/ s106/planning conditions as appropriate.</u></p>	Justified	The reference to CIL proposed by this modification would have no impact on the conclusions of the Sustainability Appraisal.	No
MM17	Policy 7	ALP/025/Q-T	Require up-to-date ecological data	A site wide landscape and ecological management plan <u>that is informed by up to date ecological information</u> to be drawn up and implemented <u>to the satisfaction of the local planning authority</u> to ensure the long-term maintenance of retained and newly created on-site habitats.	Justified	While the addition of this wording is positive, the SA was initially undertaken with an assumption that any ecological management plans for the site would be up to date. Therefore, this policy change would have no impact on the conclusions of the SA.	No
MM18	Policy 7	CD07/4A	Clarification regarding the securing of infrastructure requirements	Infrastructure requirements are to be addressed through s106/ <u>CIL</u> / planning conditions as appropriate.	Justified	The reference to CIL proposed by this modification	No

						would have no impact on the conclusions of the Sustainability Appraisal.	
MM19	Policy 7 and supporting text	ALP/025/F	Refer to 'minimum' employment floorspace	<p>Supporting text:</p> <p>2.76 On the basis of recent landscape and capacity work as well as further consideration of operational issues at the Airport, the Council considers that there is potential to provide approximately a minimum of 15,000 sqm of employment generating floorspace in the north east corner of the airport without significant impacts on the open character of the area between Shoreham and Lancing and key views to and from the South Downs National Park, as well as Airport operations...</p> <p>2.80 ...This change will facilitate the allocation of approximately a minimum of 15,000 sqm of employment floorspace at Shoreham Airport to be constructed....</p> <p>Policy 7: Shoreham Airport</p> <p>Approximately A minimum of 15,000 sqm of new employment generating floorspace (both aviation and non-aviation related), including a mix of B1 (business), B2 (general industry) and B8 (storage) / hangar uses, will be provided on the north-eastern side of the Airport (as shown on the Policies Map).</p>	Positively prepared and justified	This modification to the policy could result in a higher level of employment at Shoreham Airport. An SA is therefore required to consider the impact.	Yes
MM20	Policy 7	ALP/025/V	Provide clarification regarding any deviation to the route of the proposed boundary	<p>Approximately A minimum of 15,000 sqm of new employment generating floorspace (both aviation and non-aviation related), including a mix of B1 (business), B2 (general industry) and B8 (storage)/hangar uses, will be provided on the north-eastern side of the Airport (as shown on the Policies Map). <u>Any deviation from the boundary shown on the Policies Map must be based on a clear and convincing landscape and viability justification through the planning application process.</u></p>	Justified	This modification, while adding a degree of clarity, also introduces an additional degree of flexibility to the policy in relation to the allocation	Yes

						area. An SA is therefore required to consider the impact.	
MM21	Policy 8 and supporting text	CD07/4A	Clarification of text and policy regarding delivery of Shoreham Harbour regeneration. Include reference to Western Harbour Arm for accuracy	<p>Para 2.86</p> <p>...The JAAP will contain detailed proposals as to how the area could be developed up to 2031 2032. Approximately a minimum of 1,100 new dwellings (in the Western Harbour Arm) and a minimum of 16,000 sqm of employment generating uses (10,000sqm in the Western Harbour Arm and 4,000sqm in Southwick Waterfront) are promoted within the Shoreham Harbour Regeneration Area within Adur District during the plan period to 20342</p> <p>Policy 8:</p> <p>Shoreham Harbour Regeneration Area is identified as a broad location for change, within this Local Plan. This policy identifies the regeneration proposals for the Shoreham Harbour Regeneration Area that will be delivered over the plan period. <u>Adur District Council will work in partnership with Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority to support the regeneration of the area.</u></p> <p>The District Council will work with Brighton & Hove City Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas.</p> <p>A Joint Area Action Plan is currently being prepared which will contain a harbour wide spatial strategy, area wide policies and proposals and priorities for individual character areas. The plan will be underpinned by a delivery strategy to address a range of issues, including the provision of infrastructure. <u>The regeneration partnership will prepare a Joint Area Action Plan (JAAP) for the regeneration area. The plan will be</u></p>	Justified	<p>These modifications relate mainly to procedural issues and will not have an impact on the conclusions of the Sustainability Appraisal.</p> <p>While the modifications to the supporting text refer to 'minimum' figures for employment floorspace, the implications of this are addressed under MM22.</p>	No

				<p><u>jointly adopted by Adur, Brighton & Hove and West Sussex County Councils.</u></p> <p><u>The JAAP will include a spatial strategy, area-wide policies, and specific proposals for individual character areas within the regeneration area. The plan will be underpinned by a delivery strategy to address a range of issues, including the provision of infrastructure.</u></p> <p>As part of the process of preparing the Joint Area Action Plan, development briefs have been adopted for key areas of change within the harbour, setting out guiding principles for development. Developments will be encouraged that are consistent with the Vision and Strategic Objectives as set out in the emerging JAAP and the guiding principles within the adopted development briefs.</p> <p>The Council will facilitate the delivery of a minimum of 1100 new dwellings <u>and a minimum of 16,000 sqm of employment generating uses (including B1 uses)</u> within <u>that part of</u> the Shoreham Harbour Regeneration Area <u>Western Harbour Arm</u> within Adur District during the plan period to <u>20342 (as shown on the Policies Map).</u></p>			
MM22	Policy 8	ALP/025/F	Refer to 'minimum' employment floorspace	Policy 8: Shoreham Harbour Regeneration Area ...A total of approximately minimum of 16,000 sqm of employment generating uses (including B1 uses) will also be provided up to 2034 <u>2</u> ...	Positively prepared and justified	This modification to the policy could result in a higher level of employment at Shoreham Harbour. An SA is therefore required to consider the impact.	Yes
MM23	Paragraphs 3.1, 4.66 etc.	CD07/4A	Clarification regarding D1 uses	Para 3.1 ...More detail regarding appropriate uses in Lancing town centre is set out in the policy below. These are viewed as positive planning actions to maintain and enhance a healthy and vibrant village centre. <u>The policy also allows for appropriate D1 uses in certain</u>	Justified	This is an addition to supporting text and not policy. While this addition	No

				<p><u>circumstances in the primary and secondary frontages of Lancing town centre in addition to A class uses. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></p> <p>Para 4.66a</p> <p><u>It is considered that due to the changing role of town centres as a result primarily of the growth in online shopping, there is a need for high streets to offer something that the internet cannot. Therefore, in addition to A3 and A4 uses, the place based policies in Part 3 of this Plan also allow for appropriate D1 uses in the primary and secondary frontages. In this case, appropriate D1 uses are those that contribute positively to the vitality and viability of a centre, generating footfall throughout the day and retaining a shopfront. Such uses would normally include those in the health and beauty sector.</u></p>		<p>supports a number of the Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.</p>	
MM24	Policy 9	CD07/4A	<p>Clarification regarding D1 uses</p>	<p>Within the primary frontages of blocks 1, 2 (excluding Queensway Shopping Precinct) and 3, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> · A1 (shops) · A3 (food and drink), A4 (drinking establishments) and appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use. <p>Any other uses will be resisted.</p> <p>Within the primary frontage of Queensway Shopping Precinct, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> · A1 (shops) · A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), A5 (hot food takeaways) and appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts 	Justified	<p>This addition needs to be read in conjunction with new paragraph 4.66a (see above). While the addition supports a number of Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.</p>	No

				have been made to sell or let the premises for A1 use.			
MM25	Policy 11 and para 3.13	CD07/4A	Clarification regarding D1 uses	<p>3.13: Shoreham town centre is relatively healthy and provides a different and complementary retail offer distinct from the larger shopping centres in the area (Brighton and Worthing). Its day-to-day shopping function should be protected, and its niche shopping role maintained and developed to serve the needs of residents and visitors, including the needs arising from new homes and businesses proposed in the area. <u>The policy below allows for A class uses as well appropriate D1 uses in certain circumstances in the primary and secondary frontages in Shoreham town centre. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</u></p> <p>Policy 11:</p> <p>Within the primary frontages of blocks 2, 3, 5 and 6 the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> · A1 (shops) · A3 (food and drink) <u>and appropriate D1 (non-residential institutions) uses</u> where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 use. <p>Any other uses will be resisted.</p> <p>Within the primary frontage of block 4, the following uses will be acceptable at ground floor level, subject to compliance with other relevant policies:</p> <ul style="list-style-type: none"> · A1 (shops) and A3 (food and drink). · <u>Appropriate D1 (non-residential institutions) uses where there is a long term vacancy (normally a minimum of 1 year) and reasonable attempts have been made to sell or let the premises for A1 or A3 use.</u> <p>Any other uses will be resisted.</p> <p>Within the secondary frontages of blocks 1, 7 and 8, the following uses will be acceptable at ground floor level, subject to other relevant policies:</p> <ul style="list-style-type: none"> · A1 (shops), A2 (financial and professional 	Justified	This addition needs to be read in conjunction with new paragraph 4.66a (see above). While the addition supports a number of Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.	No

				services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) and appropriate D1 (non-residential institutions) uses.			
MM26	Policy 12 and para 3.34	CD07/4A	Clarification regarding D1 uses	<p>3.34: Southwick Square is owned by Adur District Council and performs well as a shopping centre meeting local day-to-day needs. The Adur Retail Study Update (2013) recommends that every opportunity should be taken to sustain and enhance its important shopping function and to improve its existing environment and townscape quality. The centre also provides other services for the community including a library, health centre and a community centre. The policy below allows for A class uses as well as appropriate D1 uses within Southwick Square. Please see paragraph 4.66a in Part 4 of the Plan for more information on appropriate D1 uses.</p> <p>Policy 12</p> <p>Within the primary frontage of Southwick town centre, A1 (shop) uses will be supported. A2 (financial and professional services), A3 (food and drink), A4 (drinking establishments), and A5 (hot food takeaways) and appropriate D1 (non-residential institutions) uses will also be permitted where they would not have an adverse impact on the vitality and viability of the town centre.</p>	Justified	This addition needs to be read in conjunction with new paragraph 4.66a (see above). While the addition supports a number of Sustainability Objectives, it would have little effect on the outcome of the Sustainability Appraisal.	No
MM27	Policy 13	ALP/025/E	Amend policy on countryside and coast, specifically referring to 'setting'	...The landscape character of Adur and other areas of countryside, the coast, river, and settlement pattern will be protected and where possible enhanced. Any development or activities within the countryside must respect and where appropriate reinforce the setting , distinctiveness and sense of place of the above areas, taking into account the various elements which contribute to their distinctiveness such as geology and landform, biodiversity, scenic quality, strategic views, tree cover, settlement patterns, heritage and local vernacular, and land use. The setting of the South Downs National Park must also be respected.	Justified	This modification introduces an additional consideration (setting) into the policy and will therefore require SA.	Yes
MM28	Policy 14	ALP/025/E	Amend green gaps boundary to include only land essential to	Local Green Gaps between the settlements of Lancing/ Sompting–Worthing, and Lancing Shoreham-by-Sea will be protected in order to retain the separate identities and character avoid coalescence of these settlements.	Justified	While this modification emphasises the importance	No

			<p>prevent the coalescence of settlements. Amend policy wording and Policies Map accordingly. Those areas of land to be removed from the local gap designation will remain outside the settlement boundary</p>	<p>Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements.</p>		<p>of avoiding coalescence, the need to prevent coalescence of settlements is already included in the policy and therefore this modification would not affect the conclusions of the SA.</p> <p>With regard to the amendment to the Local Green Gap boundary to only include the area essential to preventing coalescence, it is not considered that this requires a further SA, but is considered in more detail in section 7.22 of this SA addendum.</p>	
MM29	Paragraph 4.29	CD07/4A	<p>Clarify mix of housing being sought</p>	<p>The findings from the OAN reports suggest that for market housing...</p> <p>... However, at a district-wide level, within the Local Plan area future delivery of market housing should reflect the following mix:</p> <ul style="list-style-type: none"> • 1-bed properties: 5-10% • 2-bed properties: 40-45% 	Justified	<p>This is an update to supporting text and not policy. Additionally, the update reflects current housing need. This would</p>	No

				<ul style="list-style-type: none"> 3-bed properties: 40-45% 35% 4-bed properties: 5-10% 		have no effect on the outcome of the Sustainability Appraisal.						
MM30	Paragraph 4.40A	CD07/4A	Refer to 10% adjustment	<p>Average wages in Adur are low and an estimated 83% of households with a current need are unlikely to have sufficient income to afford market housing. <u>The scale of affordable housing need is substantial and whilst it is unrealistic that this need will be met in full, an upward adjustment of 10% to demographic projections has been taken account of within the objectively assessed need figure, in order to boost the delivery of both market and affordable housing and improve affordability.</u> The evidence indicates that, whilst there is a shortfall in the need for and supply of affordable housing, it does not necessitate an increase in the overall housing supply. However, a higher level of overall housing delivery would help improve affordability for younger households and so over the Plan period an increase of 10 homes per annum is considered appropriate</p>	Justified	This is an update to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.	No					
MM31	Paragraph 4.40C	CD07/4A	Up-date regarding dwelling size and need	<p>Smaller properties are in greatest demand, although letting requirements on 4+ bed properties are more critical, as there is minimal turnover on these larger homes. At a district-wide level, the OAN report recommends the following mix of affordable housing:</p> <ul style="list-style-type: none"> 1 bed dwellings 20-25% 2 bed dwellings 30-35% 3 bed dwellings 30-35% 4 bed dwellings 10-15% <p><u>In terms of need for different sizes of dwellings, evidence clearly indicates that the need for social/ rented dwellings is focused towards smaller dwellings but with an overall profile whereby the greatest need is for two and three bed dwellings:</u></p> <table border="1" data-bbox="981 1268 1509 1372"> <tr> <td></td> <td><u>1 bedroom</u></td> <td><u>2 bedroom</u></td> <td><u>3 bedroom</u></td> <td><u>4 bedroom</u></td> </tr> </table>		<u>1 bedroom</u>	<u>2 bedroom</u>	<u>3 bedroom</u>	<u>4 bedroom</u>	Justified	This is an update to supporting text and not policy and would therefore have no effect on the outcome of the Sustainability Appraisal.	No
	<u>1 bedroom</u>	<u>2 bedroom</u>	<u>3 bedroom</u>	<u>4 bedroom</u>								

				<table border="1"> <tr> <td>Intermediate homes</td> <td>15-20%</td> <td>50-55%</td> <td>25-30%</td> <td>0-5%</td> </tr> <tr> <td>Social/Affordable Rent</td> <td>30%</td> <td>40%</td> <td>25%</td> <td>5%</td> </tr> </table>	Intermediate homes	15-20%	50-55%	25-30%	0-5%	Social/Affordable Rent	30%	40%	25%	5%			
Intermediate homes	15-20%	50-55%	25-30%	0-5%													
Social/Affordable Rent	30%	40%	25%	5%													
MM32	Policy 21 and paragraph 4.30	ALP/025/J	Clarification regarding meeting building regulation standards	<p>Para 4.30....It is recognised that the number of elderly households and other sectors of the community are likely to have a need for homes designed to meet their changing needs and to enable them to remain living independently at home for longer. <u>The Government has introduced new optional higher Building Regulation Standards M4(2) Category 2: Accessible and Adaptable dwellings and M4(3) Category 3: Wheelchair user dwellings in new residential dwellings where a local planning authority has a policy in place and evidence that a higher level of accessibility is viable and necessary to meet current and future needs. The Council has produced a Whole Plan Viability Assessment which has incorporated costs of building all new homes to the higher optional Building Regulations Standard M4(2) Accessible and Adaptable Dwellings and this has been found to be achievable. However, in some new developments it may not be practical or feasible to incorporate step free access to dwellings because of the need to address flood risk issues and this will be taken into consideration when determining planning applications.</u> The Council will therefore encourage all new homes to be built to the higher optional Building Regulations Standard M4(2) Accessible and Adaptable Dwellings and will apply it as a planning condition to development where viability is not compromised.</p> <p>Policy 21</p> <p>The Council will expect all new build dwellings relevant applications to meet the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings where feasible and viable,</p>	Justified	The purpose of this modification is primarily clarification and as a result it would have no impact on the conclusions of the SA.	No										

				<p><u>and to meet national minimum space standards in all new dwellings across all tenures.</u> <u>The requirement to provide affordable dwellings constructed to building regulations Standard M4(3) Category 3: wheelchair accessible standards will be dependent on identified need at the time a planning application is submitted and the suitability of the site.</u></p> <p>Footnote to para 4.30 <u>Adur District Council Whole Plan & Community Infrastructure Levy Viability Assessment 2017: Nationwide CIL Service</u></p>			
MM33	Policy 21	ALP/025/K	Clarification regarding Space Standards	<p><u>New residential development (including through conversions and changes of use) should.....</u></p> <p><u>The Council will expect relevant applications, and to meet minimum national minimum space standards in all new dwellings across all tenures.</u></p> <p><u>New dwellings across all tenures will be expected to meet the minimum nationally described space standards unless it can be demonstrated that, in terms of dwellings created through conversion or subdivision, there are exceptional reasons why some or all of these requirements cannot be met.</u></p> <p><u>...Proposals will be expected to comply with the criteria contained in the council's adopted Development Control Standard "Flat conversions" (as amended or superseded by other Council guidance in force at that time an application is considered) or any other appropriate national standard.</u></p>	Justified	The purpose of this modification is primarily clarification and as a result it would have no impact on the conclusions of the SA.	No
MM34	Policy 22	ALP/025/O	AH: provide consistency with Written Ministerial Statement (28.11.14) by amending policy 22 and deleting paragraph 4.44	<p>Para 4.44 Local Planning Authorities are now able to set their own threshold above which affordable housing should be sought. Historically, the majority of sites that come forward in Adur accommodate less than 15 dwellings. Evidence indicates that the size of site (in terms of numbers of dwellings) can be lower than the current threshold of 15 dwellings without adversely affecting viability. This means that affordable housing can be provided in smaller developments than is currently the case.</p>	Justified	This modification could have a significant impact on the amount of affordable housing provided in the Local Plan area. An SA is needed to	Yes

				<p>Policy 22 New residential development will be expected to make provision for a mix of affordable housing, including social rented, affordable rented and intermediate housing according to the following site size thresholds:</p> <p>On sites of 1-5 dwellings (gross) 10% affordable housing will be sought via a financial contribution. On sites of 6-14 dwellings (gross) 20% affordable housing will be sought. On sites of 15 (gross) dwellings or more 30% affordable housing will be sought</p> <p><u>On development sites of 11 dwellings or more (gross) a target of 30% affordable housing, including social rented, affordable rented and intermediate housing will be sought.</u></p> <p>The preferred mix of tenure ...</p> <p>On individual sites....</p> <p>Where developers....</p> <p>On sites of 6 or more dwellings, in <u>In exceptional circumstances only, if a site meets....</u></p>		consider the impact.	
MM35	Paragraph 4.66a	CD07/4A	Insert new paragraph regarding support for appropriate D1 uses in town centres	<p><u>It is considered that due to the changing role of town centres as a result primarily of the growth in online shopping, there is a need for high streets to offer something that the internet cannot. Therefore, in addition to A3 and A4 uses, the place based policies in Part 3 of this Plan also allow for appropriate D1 uses in the primary and secondary frontages. In this case, appropriate D1 uses are those that contribute positively to the vitality and viability of a centre, generating footfall throughout the day and retaining a shopfront. Such uses would normally include those in the health and beauty sector.</u></p>	Justified	This addition needs to be read in conjunction with the proposed additions to policies 9, 11 and 12 (see above). While the addition supports a number of the Sustainability Objectives, it would have little effect on the outcome of	No

						the Sustainability Appraisal.	
MM36	Policy 33	CD07/4A	Clarification regarding land not required to meet an open space shortfall	<p>The loss of existing open space, or sports and recreation buildings/facilities will be resisted unless:</p> <p>i. The development is for alternative sports and recreational provision, the need for which clearly outweighs the loss; or</p> <p>ii. An assessment has been undertaken which clearly shows the open space, buildings or land to be surplus to requirements <u>and not required to meet any other shortfalls in open space types; or</u></p> <p>-iii. and is not required to meet any other shortfalls in open space types; or</p> <p>-iv. iii. The loss resulting from the proposed development would be replaced by equivalent or improved provision in terms of quantity and quality in a suitable location.</p>	Justified	This modification is entirely for clarification purposes and as a result it would have no impact on the conclusions of the SA.	No
MM37	Policy 35	ALP/025/BBCC	Clarification regarding pollution that cannot be mitigated	<p>Mitigation measures will need to be implemented for developments that could increase levels of pollution or have a negative impact on drinking water supplies in Adur. Where <u>there are significant</u> increased levels of <u>increased</u> pollution <u>that</u> cannot be mitigated, development will be resisted <u>refused.</u></p>	Justified	This modification changes the policy slightly in that it allows for a certain level of increased pollution provided it is not significant. This will therefore require SA.	Yes
MM38	Policies 5-9, 11-14, 26 and 28	ALP/025/H	Make cross-reference to the Policies Map	<p>Policy 5:</p> <p>Land at New Monks Farm (within the area shown on Map 2 <u>as shown on the Policies Map</u>)...</p> <p>Policy 6:</p>	Justified	This is a procedural modification and would not have any effect on the conclusions of the SA.	No

				<p>Land at West Sompting (within the area shown on Map 3 <u>as shown on the Policies Map</u>)...</p> <p>...north of the existing Cokeham Brooks SNCI (<u>as shown on the Policies Map</u>)</p> <p>Policy 7:</p> <p>Approximately 15,000 sqm of new employment generating floorspace (<u>as shown on the Policies Map</u>)...</p> <p>Within the existing developed area located at the southern end of the Airport (<u>as shown on the Policies Map</u>), airside....</p> <p>Policy 8:</p> <p>Shoreham Harbour Regeneration Area (<u>as shown on the Policies Map</u>) is identified....</p> <p>Policy 9:</p> <p>Development within the primary and secondary frontages of Lancing village centre (<u>as shown on the Policies Map</u>) will need.....</p> <p>Lancing Business Park (<u>as shown on the Policies Map</u>)...</p> <p>Policy 11:</p> <p>The <u>following</u> town centre and edge of centre sites (<u>as shown on the Policies Map</u>) identified below will...</p> <p>Development within the primary and secondary frontages of Shoreham town centre (<u>as shown on the Policies Map</u>) will need.....</p> <p>Dolphin Road Business Park (<u>as shown on the Policies Map</u>)...</p>			
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				<p>Policy 12:</p> <p>Within the primary frontage of Southwick town centre (<u>as shown on the Policies Map</u>), A1....</p> <p>Policy 13:</p> <p>Outside of the Built Up Area Boundary (<u>as shown on the Policies Map</u>), development....</p> <p>Policy 14:</p> <p>Local Green Gaps between the settlements of Lancing/ Sompting-Worthing, and Lancing-Shoreham-by-Sea (<u>as shown on the Policies Map</u>) will be....</p> <p>Policy 26:</p> <p>Where planning permission is required, proposed conversions to uses other than employment (B1, B2 and B8 of the Use Classes Order) in the following employment sites (<u>as shown on the Policies Map</u>) will be...</p> <p>Policy 28:</p> <p>Within the defined town centre boundaries of Shoreham-by-Sea, Southwick and Lancing (<u>as shown on the Policies Map</u>), town centre uses.....</p>			
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4 THE SUSTAINABILITY APPRAISAL

- 4.1 The need to carry out a Sustainability Appraisal and Strategic Environmental Assessment of the Local Plan is required by both European and UK law.
- 4.2 A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from plans, such as a Local Plan. It is a process for understanding whether policies, strategies or plans promote sustainable development and for improving them to deliver more sustainable outcomes. The SEA process has been incorporated into the SA process. Therefore, where this report refers to the SA it can be assumed that this also means the SEA.
- 4.3 As set out in Table 2 (above), this SA appraises the proposed Main Modifications where it is considered necessary to do so.

5 THE SUSTAINABILITY FRAMEWORK

- 5.1 The SA framework used in this report is the same as that used in the previous Adur Local Plan SA reports and is set out below in Table 3. The relevant policies subject to proposed Main Modifications have been, where necessary, re-assessed against this framework.

Table 3: The Sustainability Framework

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
1. Increase energy efficiency and encourage the use of renewable energy sources	<ul style="list-style-type: none"> • Promote low/zero carbon development? • Affect both new development and existing buildings? • Support renewable energy developments / installations or schemes for energy efficient supply? • Support reduced average annual domestic consumption of electricity and gas? • Support reduced average annual commercial and industrial consumption of electricity and gas?
2. Protect and enhance water quality and encourage the sustainable use of water	<ul style="list-style-type: none"> • Protect the quality and quantity of groundwater in the district from the detrimental impacts of development? • Encourage greater efficiency in the use of water, helping to ensure reduced average per capita consumption of water? • Ensure no deterioration of waterbodies designated under the Water Framework Directive and help to ensure that waterbodies achieve at least good ecological status or good ecological potential by 2015? • Promote use of SuDS?
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials	<ul style="list-style-type: none"> • Direct development to brownfield areas before greenfield? • Support remediation of contamination as part of the redevelopment of brownfield sites?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats	<ul style="list-style-type: none"> • Help to ensure that biodiversity (and the habitats that support it) is protected and, where possible, enhanced and that capacity exists to allow adaptation to a changing climate? • Achieve a net gain in biodiversity locally? • Contribute to any of the Biodiversity Opportunity Areas? • Will the Plan enhance biodiversity through the provision of green infrastructure?
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes	<ul style="list-style-type: none"> • Maintain and enhance local distinctiveness? • Protect and enhance heritage assets in-line with established strategies (e.g. conservation area appraisals)? • Address listed buildings and Conservation Areas at risk?
6. Protect and enhance the countryside	<ul style="list-style-type: none"> • Help to maintain and enhance the natural and built environment of the district, ensuring that it is not adversely affected by development? • Minimise development outside the built up area boundary, and in particular within the National Park?
7. Protect and enhance public open space / green infrastructure and accessibility to it	<ul style="list-style-type: none"> • Prevent inappropriate development on accessible public open space and other key areas of green infrastructure? • Facilitate a green infrastructure network, e.g. by supporting the provision of multifunctional green space including open green space, sustainable drainage and biodiversity? • Protect playing fields and indoor and outdoor sports facilities? • Maintain and, where possible, enhance the amount of open space in the district per 1000 population?
8. Reduce pollution and the risk of pollution to air, land and water.	<ul style="list-style-type: none"> • Protect surface watercourses or groundwater protection zones? • Facilitate necessary upgrades to infrastructure associated with foul and surface water? • Address air quality within AQMAs? • Reduce levels of noise, vibration and light pollution? • Contribute to a reduction in CO₂ emissions per capita?
9. Ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events	<ul style="list-style-type: none"> • Encourage adaptation techniques? • See criteria relating to other SA objectives on water, energy efficiency, biodiversity etc.
10. Improve health and wellbeing and reduce inequalities in health	<ul style="list-style-type: none"> • Facilitate healthy lifestyles, including participation in sport? • Help secure necessary health related infrastructure? • Help to address existing health issues?
11. Reduce crime, the fear of crime and antisocial behaviour	<ul style="list-style-type: none"> • Improve community safety? • Help to ensure crime prevention measures are incorporated into new and existing development?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
12. Promote sustainable transport and reduce the use of the private car	<ul style="list-style-type: none"> • Promote alternative modes of transport to the car. • Help reduce the need to travel, including by establishing a more sustainable pattern of settlements? • Integrate land uses, transport infrastructure and public transport? • Increase the carbon efficiency of transport networks? • Promote mixed use, and higher density development, which has adequate public transport infrastructure?
13. Reduce poverty, social exclusion and social inequalities	<ul style="list-style-type: none"> • Help to minimise discrimination related to age, gender disability, race, faith, location and income? • Address issues highlighted by the Index of Multiple Deprivation dataset? • Address issues of fuel poverty?
14. Meet the need for housing and ensure all groups have access to decent / appropriate housing	<ul style="list-style-type: none"> • Support increased dwelling (including affordable housing) completions? • Help to reduce the number of households classified as having priority needs on the housing register?
15. Create and sustain vibrant communities which recognise the needs and contributions of all.	<ul style="list-style-type: none"> • Encourage mixed communities? • Secure the necessary infrastructure to support communities?
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.	<ul style="list-style-type: none"> • Support the retention and modernisation of existing businesses and ensure the provision of infrastructure, services and facilities essential to support new employment opportunities? • Support an increase in additional employment floorspace per annum? • Help to attract younger people to live and work in the district? • Provide a focus on achieving vital and viable town centres (Shoreham, Southwick and Lancing) and regenerating deprived areas? • Support an increase in average gross weekly earnings? • Facilitate a sustainable visitor economy?
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development	<ul style="list-style-type: none"> • Facilitate the improvement of coastal defences? • Promote a sequential approach to avoid development in areas at risk of flooding? • Promote use of SuDS? • Address coastal erosion? • Work with natural processes and have regard to biodiversity?
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres	<ul style="list-style-type: none"> • Help to improve accessibility to existing services/facilities? • Secure new infrastructure and/or encourage better use of existing? • Maintain/enhance the amount of floorspace provided for 'town centre uses' within town centres?

Sustainability objectives	Supporting criteria <i>Will the site/policy proposal under consideration...</i>
19. Create places, spaces and buildings that work well, wear well and look good.	<ul style="list-style-type: none"> Promote high standards of design?
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.	<ul style="list-style-type: none"> Ensure adequate provision of skills/training facilities? Improve accessibility to existing educational facilities? Facilitate the provision of new educational facilities? Target lower super output areas in Adur within 10% most deprived in England in respect of education, skills and training?
21. Reduce the amount of domestic and commercial waste going to landfill as per the waste hierarchy.	<ul style="list-style-type: none"> Ensure that provision for waste is adequate for the current and future development needs, bearing in mind that the land available to dispose of this waste (landfill sites) is reducing? Improve access to recycling and other waste management facilities?

6 THE SA METHODOLOGY

6.1 The aim of a Sustainability Appraisal is to ‘identify and evaluate the likely significant effects’ of the preferred approach on the baseline, drawing on the sustainability objectives and issues as a methodological framework. The SA methodology is the same as that used in previous Adur Local Plan SA reports. A colour coding system has been used as part of this process and this is as follows:

Green	Positive impact / consistent with Sustainability Objectives
Amber	Mixed impacts / potential for conflict with Sustainability Objectives
Red	Negative impact / conflict with Sustainability Objectives
0	No impact or negligible impact/ issue addressed by other policies in Local Plan / N/A (Not applicable)

- 6.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline.¹
- 6.3 Because of the uncertainties involved there is inevitably a need to make assumptions. Assumptions are made cautiously, and explained within the text as appropriate. The aim is to strike a balance between comprehensiveness and accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.
- 6.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.² So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Adur Local Plan to impact on 'receptors' in combination with other planned activity (e.g. activity that will occur as a result of plans prepared by neighbouring authorities). These effect components/characteristics are described within the appraisal as appropriate.

7 MAIN MODIFICATIONS APPRAISAL FINDINGS

- 7.1 This chapter presents summary appraisal findings in relation to the Main Modifications to the Submission Adur Local Plan 2016 published in June 2017. However, as shown in Table 2, it was not considered necessary to reappraise the majority of the Main Modifications. Detailed appraisal findings are presented within Appendix 1 of this document but are summarised within the text below. The Main Modifications were assessed in the context of the overall policy being modified rather than in isolation. Therefore, the whole policy was re-assessed, taking account of the relevant Main Modification(s).

Policy 4: Planning for Economic Growth

- 7.2 The Main Modification (MM4) to Policy 4 proposes changing the employment floorspace figures to 'minimum' amounts (please see Table 2 for more detail). While this would potentially allow for an increased quantum of employment development at New Monks Farm, Shoreham Airport and Shoreham Harbour, any floorspace increases would still be subject to other policy requirements including the need to minimise impacts on landscape, ecology, drainage etc. Therefore, the addition of a minimum requirement is not necessarily a 'blank cheque', allowing for unconstrained development but instead a mechanism to allow for a greater floorspace quantum where this can be delivered appropriately in accordance with policies in the Local Plan. The modified policy has been assessed on this basis and would not impact negatively on any of the sustainability objectives. As a result the conclusions of the SA do not differ from those in the Submission SA.

Conclusion:

- 7.3 Main Modification 4 would have no impacts on the conclusion of the SA.

Policy 5: New Monks Farm, Lancing

There are 3 Main Modifications proposed to Policy 5. These are as follows:

- 7.4 MM8 – This modification proposes changing the housing provision to a 'minimum' amount (a minimum of 600 dwellings). While this would potentially allow for an increased level of housing development at New Monks Farm, any increase in housing numbers would still be subject to other policy requirements including the need to minimise impacts on landscape, ecology, drainage etc, as well as the requirement of the development to provide a minimum of

¹ The implication being that it is difficult, if not impossible, to identify a 'cause-effect relationship' with any certainty.

² Environmental Assessment of Plans and Programmes Regulations 2004

10,000sqm of employment floorspace, a new primary school and country park. Therefore, the addition of a minimum requirement is not necessarily a 'blank cheque' allowing for unconstrained development but instead a mechanism to allow for greater housing numbers where this can be delivered appropriately in accordance with policies in the Local Plan. The modified policy has been assessed on this basis and would not impact negatively on any of the sustainability objectives.

- 7.5 MM8 also proposes changing the employment floorspace provision to a 'minimum' amount (a minimum of 10,000sqm. The impact of this modification is described under MM4 (see above).
- 7.6 MM9 – This modification proposes changing the size of the country park to a 'minimum' figure (a minimum of 28 hectares). This would potentially allow for a larger country park but the other requirements of the policy would still need to be complied with such as the requirement for a minimum of 600 homes, a minimum of 10,000sqm of employment floorspace, a new primary school etc. so the modification would not affect the amount of development at New Monks Farm and would therefore not impact negatively on any of the Sustainability objectives.
- 7.7 MM10 – This modification proposes adding to the policy the requirement for a strategy setting out the long term management and maintenance of drainage on the site. While this modification would help support sustainability objective 9 (climate change and extreme weather) and 17 (flood risk), it would not change the scoring or overall conclusions of the SA.

Conclusion:

- 7.8 The three proposed modifications to policy 5 would not individually or cumulatively have an impact on the conclusions of the SA.

Policy 6: West Sompting

- 7.9 The Main Modification (MM16) to Policy 6 proposes changing the housing provision to a 'minimum' amount (a minimum of 480 dwellings). While this would potentially allow for an increased level of housing development at West Sompting, any increase in housing numbers would still be subject to other policy requirements including the need to minimise impacts on landscape, ecology, drainage etc. Therefore, the addition of a minimum requirement is not necessarily a 'blank cheque' allowing for unconstrained development but instead a mechanism to allow for greater housing numbers where this can be delivered appropriately in accordance with policies in the Local Plan. The modified policy has been assessed on this basis and would not impact negatively on any of the sustainability objectives.

Conclusion:

- 7.10 Main Modification 16 would have no impacts on the conclusion of the SA and can therefore be considered appropriate.

Policy 7: Shoreham Airport

There are 2 Main Modifications proposed to Policy 7. These are as follows:

- 7.11 MM19 – This modification proposes changing the employment floorspace provision to a 'minimum' amount (a minimum of 15,000sqm). The impact of this Modification is described under MM4 (see above).
- 7.12 MM20 - This modification proposes additional text clarifying that any deviation from the allocation boundary shown on the Policies Map must be based on a clear and convincing landscape and viability justification through the planning application process. While this modification provides a greater degree of flexibility in relation to the allocation boundary, it makes clear that this would need to be justified. The policy already makes clear that new

development must minimise its impact on the landscape and the open nature of the Local Green Gap, and this policy, along with other policies within the Plan, aim to ensure that impacts on ecology, drainage etc. are also minimised so it is not considered that this modification would have a detrimental impact on the sustainability objectives.

Conclusion:

- 7.13 The two proposed modifications to policy 7 would not individually or cumulatively have an impact on the conclusions of the SA.

Policy 8: Shoreham Harbour Regeneration Area

- 7.14 The Main Modification (MM22) to Policy 8 proposes changing the employment floorspace provision to a 'minimum' amount (a minimum of 10,000sqm). The impact of this modification is described under MM4 (see above).

Conclusion:

- 7.15 The proposed modification would not have an impact on the conclusions of the SA.

Policy 13: Adur's Countryside and Coast

- 7.16 The Main Modification (MM27) to Policy 13 proposes adding the word 'setting' to the policy to ensure that 'setting' is considered when development or activities are proposed in the countryside. While this is a positive addition that will contribute to a number of sustainability objectives (namely 5 (historic environment) and 6 (countryside)), the policy already scores positively in relation to these objectives as it seeks to reinforce distinctiveness and a sense of place as well as the setting of the South Downs National Park. Therefore, the modification would have no significant impact on the sustainability objectives.

Conclusion:

- 7.17 The proposed modification would not have an impact on the conclusions of the SA.

Policy 22: Affordable Housing

- 7.18 The Main Modification (MM34) to Policy 22 aims to bring it in line with the Written Ministerial Statements (HCWS50) (Nov 2014) which states that affordable housing should not be sought on sites of less than 11 dwellings in order to support small-scale house builders and reduce disproportionate burdens on developer contributions. This modification would have significant implications for the delivery of affordable housing in the Local Plan area as the majority of residential development in the district (94%) is on sites of less than 11 dwellings. However, given that Adur District Council's existing 'Planning Contributions for Infrastructure Provision' Interim Planning Guidance document (2013) requires 30% affordable housing on sites of 15 or more, this policy would result in the provision of a greater proportion of affordable housing than the current interim guidance. Therefore, despite the modification, the policy still scores positively in relation to sustainability objectives 13 (poverty, social exclusion and social inequalities), 14 (housing) and 15 (vibrant communities).

Conclusion:

- 7.19 The proposed modification would not have a significant impact on the conclusions of the SA despite resulting in a reduction in the predicted amount of affordable housing provided over the plan period.

Policy 35: Pollution and Contamination

- 7.20 The Main Modification (MM37) to Policy 35 aims to clarify that where there are *significant* levels of increased pollution that cannot be mitigated, development will be refused. While this modification provides clarification, it also adds a slight degree of flexibility in that it addresses *significant* levels of increased pollution rather than just *any* increase in pollution. Nevertheless, the main aim of the policy is to minimise pollution as far as is reasonable and the policy still performs well against the relevant sustainability objectives.

Conclusion:

- 7.21 The proposed modification would not have an impact on the overall conclusions of the SA.

Site Options Appraisals

- 7.22 Appendix III of the Submission Adur Local Plan SA (2016) assessed a number of site options and this assessment was used to inform decisions on which sites were allocated in the Adur Local Plan. The appraisal methodology is explained in Appendix III of the Submission SA document. One of the criteria for assessing sites was as follows: ‘Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?’ Part of this assessment involved consideration of whether the site was located within the Local Green Gap. Main Modification 28 proposes an amendment to the Local Green Gap boundary to include only land essential to prevent the coalescence of settlements (see Map 1 below). This results in the exclusion of Site Option 6: Land North West of the Hasler Estate, Lancing; the western part of Site Option 7: Land North East of the Hasler Estate; Site Option 9: Shoreham Gateway; and Site Option 10: Mill Hill. The implications of this modification to the Local Green Gap boundary for the appraisal of each of these sites in relation to the criteria set out above are considered in the table below.

Table 4: SA criteria - Does the site make a major contribution to the setting, character, structure and environmental quality of the countryside/district?

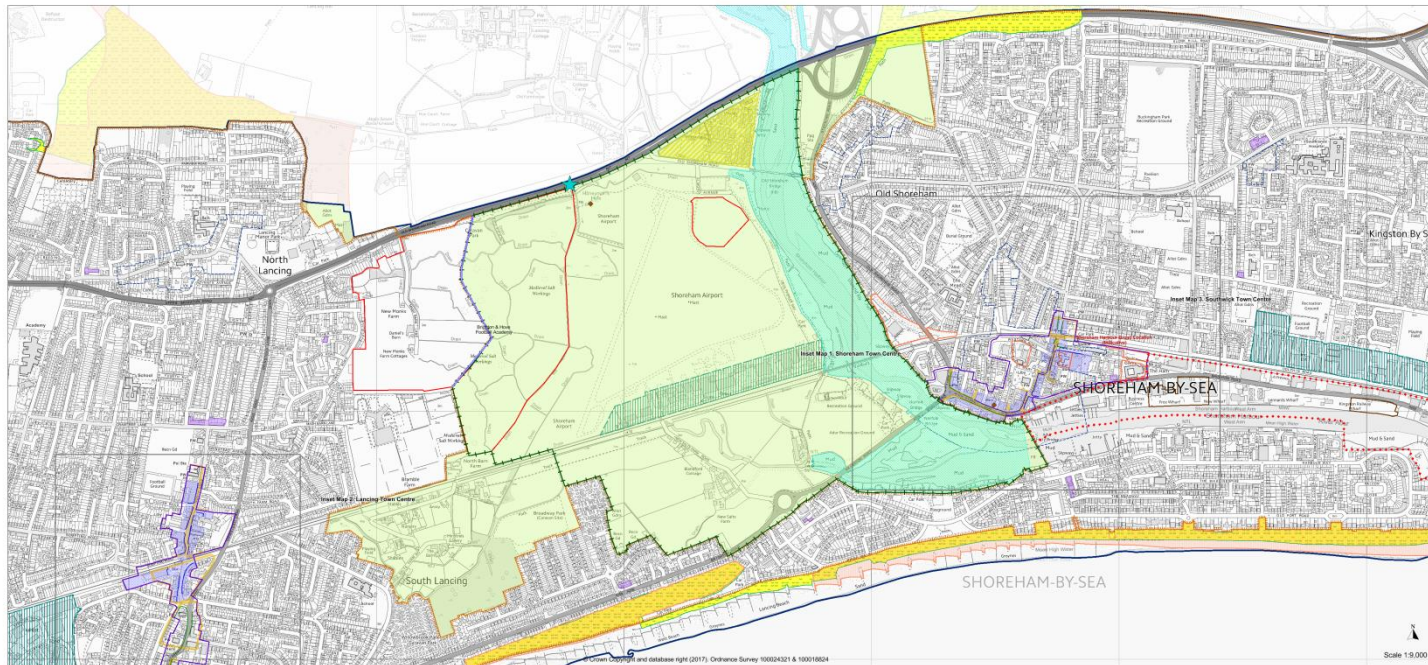
Site Option	Assessment in Submission Adur Local Plan SA 2016	Implications of proposed Local Green Gap boundary modification
Site Option 6: Land North West of the Hasler Estate	<p>Score: Amber – The site makes no major contribution to the setting, character, structure and environmental quality of the countryside/district.</p> <p>Comment: The ‘Landscape Sensitivity Assessment’ (2015) states that the site has a medium/medium-low landscape sensitivity but its relatively enclosed character, which appears ‘wooded’ in long distance views across the gap contrasts with other parts of the Lancing Gap and contributes to the landscape setting of Lancing. The ‘Landscape and Ecological Survey of Key Sites Within Adur’ (2012) sets out indicative proposals that show how development could be laid out to minimise the impact on</p>	<p>The exclusion of this site from the Local Green Gap would have no implications for the assessment of this site as it was not considered that it made a significant contribution to the setting, character, structure and environmental quality of the countryside/district.</p> <p>The main reason for this site not being allocated in the Local Plan relates to flood risk issues. Therefore, this modification to the Local Green Gap does not change the main conclusions of the site options appraisal and the site should continue to be omitted from the Local Plan.</p>

	the landscape.	
Site Option 7: Land North East of the Hasler Estate	<p>Score: Red – Yes the site makes a major contribution to the setting, structure and environmental quality of the countryside/district.</p> <p>Comment: The 'Landscape Sensitivity Assessment' (2016) states that the site has a medium-high overall landscape sensitivity and is less visible in sensitive views. However, the study also recognises that the site provides a valuable 'slice of green' separating the urban areas to the south from the buildings of Shoreham Airport. The site also contributes to the setting of the Adur Estuary.</p>	The majority of this site still remains within the Local Green Gap and provides a valuable 'slice of green' separating the urban areas to the south from the buildings of Shoreham Airport. Therefore the proposed modification to the Local Green Gap would have no impact on the overall conclusions of the site appraisal and the site should continue to be omitted from the Local Plan.
Site Option 9: Shoreham Gateway	<p>Score: Red – Yes the site makes a major contribution to the setting, structure and environmental quality of the countryside/district.</p> <p>Comment: The Shoreham Gateway Landscape Study (2016) concludes that the site makes a significant contribution to the setting of Shoreham and the River Adur, particularly when viewed from the well-used Downs link immediately to the west of the site, and the Tollbridge. The site not only acts as a gateway to Shoreham but a gateway from Shoreham to the National Park. The site is an important part of the gateway sequence of views and spaces on the northern edge of Shoreham and development of the site would be an unwelcome urbanisation.</p>	The exclusion of the site from the modified Local Green Gap would have no impact on the conclusions of the site appraisal. The site still makes a significant contribution to the setting of Shoreham and the River Adur, and acts a gateway to Shoreham and the National Park, and would constitute an unwelcome urbanisation. It is therefore considered that the site should still continue to be omitted from the Local Plan.
Site Option 10: Mill Hill	<p>Score: Red – Yes the site makes a major contribution to the setting, structure and environmental quality of the countryside/district.</p> <p>Comment: The 'Landscape Sensitivity Assessment' (2015) assessed the site as having a high</p>	The exclusion of the site from the modified Local Green Gap would have no impact on the conclusions of the site appraisal. The site remains highly vulnerable to development and is still perceived as part of the Downs. It is therefore considered that the site should

	<p>overall landscape sensitivity. The study states the following: The open, pasture is highly vulnerable to development, which could detract from its role in providing a strong visual backdrop to Old Shoreham and a link between the Downs and the extensive band of urban development along the coast. There is a critical balance between scale and openness - the field is currently perceived as part of the Downs because of its verdant openness and relatively expansive scale. However, any reduction in the size and openness of the field risks resulting in a change in character, as the field could potentially be perceived as a small urban fringe paddock rather than a component of the sweeping Downs landscape.</p>	<p>still continue to be omitted from the Local Plan.</p>
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Map 1 – Main Modification 28 showing an amended Local Green Gap boundary that no longer includes Old Salts Farm, the eastern part of New Salts Farm, Shoreham Gateway and Mill Hill.

Adur Local Plan Policies Map 2017



Key

Adur Local Plan Area	Site of Nature Conservation Importance (SNCI) - Policy 32	Town Centre Boundaries - Policy 28
Built Up Area (BUA) - Policy 2	Local Nature Reserve (LNR) - Policy 32	Primary Shopping Area - Policy 28
Indicative Built Up Area Boundary	Proposed Extension to DOD - Policy 6	Primary Retail Frontages - Policies 6, 11, 12, 28
Strategic Site Allocations - Policies 6, 6.7	Local Green Gap - Policy 14	Secondary Retail Frontages - Policies 6, 11, 28
Potential Development Sites (in or on edge of Shoreham Town Centre) - Policy 11	Countryside - Policy 13	Local Shopping Frontages - Policy 28
Protected Employment Sites - Policy 26	Riards Boundary - Policies 4, 13	Town Centre Blocks (Numbered) - Policies 6, 11
Eastbrook Development Opportunities - Policy 12	Safeguarded Wharves (as per WSCC Minerals Local Plan, 2003)	Scheduled Ancient Monuments
Shoreham Harbour Board Location - Policy 8	Conservation Areas - Policies 17, 18	Proposed Roundabouts (Indicative) - Policies 6, 7
Site of Special Scientific Interest (SSSI) - Policy 32		



Objectively Assessed Need

- 7.23 Appendix VII of the Submission Adur Local Plan SA (2016) assessed the delivery of Adur's Objectively Assessed Housing Need. Since this assessment was undertaken, Adur's Objectively Assessed Housing Need Update was produced in 2016. This updated study recommended the delivery of 6,825 dwellings over the plan period (2011-2031) whereas the Submission SA assessed 5,820 dwellings. This works out as 325 dwellings per annum (rather than 291 as assessed in the Submission SA).
- 7.24 While this increase in Adur's OAN results in a greater shortfall of housing given that the Adur Local Plan can only deliver a minimum 3,718 homes, the OAN increase will not result in any change to the Local Plan strategy due to the constraints in the Local Plan area and the fact that all the sites in Adur considered to be acceptable for development are either being allocated or constitute a broad location, or are included as part of Adur's housing supply. The conclusions of the SA would not change as a result of the OAN increase – the level of housing proposed in the Adur Local Plan (a minimum of 3,718 homes) would still achieve a greater balance between the differing social, environmental and economic sustainability objectives than delivery of the full OAN.

8 CONCLUSIONS

- 8.1 As set out above, the proposed Main Modifications would have no significant impacts on the sustainability objectives or the overall conclusions of the Sustainability Appraisal, either individually or cumulatively. Assessed against the Sustainability Framework, the Modified policies score identically to the policies in the Submission Adur Local Plan 2016. There are therefore no sustainability reasons as to why the relevant policies in the Adur Local Plan should not be amended in accordance with the Proposed Main Modifications.

Appendix 1 – Sustainability Appraisal of Modified Local Plan Policies

This appendix sets out the changes made to the Sustainability Appraisal (SA) following the reassessment of a number of policies taking into account the Proposed Main Modifications. Amendments to the SA are shown as follows: Additional text is shown as **bold and underlined**, and deleted text is shown as ~~struck through~~.

SA of Policy 4 (Planning for Economic Growth) to assess impact of Main Modifications 4 & 5 (see Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources
This objective is addressed by other policies within the Plan.
2. Protect and enhance water quality and encourage the sustainable use of water
Amber This objective is partly addressed by other policies within the Plan. However, this policy promotes new development at Shoreham Airport and Shoreham Harbour. Both developments could potentially impact on water quality given their close proximity to the River Adur. Please see the Sustainability Appraisal for Policy 7: Shoreham Airport and Policy 8: Shoreham Harbour for more detail.
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials
Green This policy promotes both brownfield and greenfield sites for new employment development. However, this is within the context of the overall strategy of the Plan ensuring that greenfield sites are only used when there are insufficient brownfield sites available.
4. Conserve, protect and enhance biodiversity
Amber This objective is primarily addressed by other policies within the Plan but there is potential for new employment development at Shoreham Airport to have a negative impact on the River Adur SSSI given its close proximity (see the SA of Policy 7 for more detail).
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes
Amber This objective is partly addressed by other policies within the Plan. However, new employment development at Shoreham Airport and New Monks Farm would be likely to have some negative impacts on the Local Green Gaps and the general historic settlement pattern of the district. Additionally, development at Shoreham Airport would have some impact on the setting of the River Adur and it will need to be ensured that new development does not affect the setting of the Grade II* Listed Terminal Building, the Grade II Listed Hangar, or the Trainer Dome Scheduled Ancient Monument. Other policies in the Local Plan seek to mitigate and minimise these impacts.
6. Protect and enhance the countryside
Amber New employment development at Shoreham Airport and New Monks Farm would be likely to have some impacts on the integrity of the Local Green Gaps due to their location as well as being visible from a number of key locations within the National Park. Additionally, development at Shoreham Airport would have some impacts on the setting of the River Adur. Other policies in the Local Plan seek to mitigate and minimise these impacts.
7. Protect and enhance public open space / green infrastructure and accessibility to it
This objective is addressed by other policies within the Plan.

8. To reduce pollution and the risk of pollution to air, land and water
<p>Amber</p> <p>This objective is partly addressed by other policies within the Plan but new employment development in the district, including at Shoreham Airport and Shoreham Harbour, has potential to have a negative impact on this objective, particularly through increased car movements and the resulting impacts on air quality. Please see the SA of Policies 5 (New Monks Farm), 7 (Shoreham Airport) and 8 (Shoreham Harbour) for more detail. However, it should also be considered that more employment opportunities in the district could potentially reduce out-commuting so this could offset such impacts to some degree.</p> <p>As set out under Objective 2, development at Shoreham Harbour and Shoreham Airport could also impact on water quality due to the close proximity to the Adur Estuary SSSI.</p>
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events
This objective is addressed by other policies within the Plan.
10. To improve health and wellbeing and reduce inequalities in health
This objective is addressed by other policies within the Plan.
11. To reduce crime, the fear of crime and antisocial behaviour
This objective is addressed by other policies within the Plan.
12. Promote sustainable transport and reduce the use of the private car
This objective is addressed by other policies within the Plan.
13. To reduce poverty, social exclusion and social inequalities
<p>Green</p> <p>The policy takes a proactive approach to the provision of a significant amount of new employment generating floorspace in the district which will help increase job opportunities. This will result in a positive impact on this objective.</p>
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
This objective is addressed by other policies within the Plan.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals
<p>Green</p> <p>This objective is partly addressed by other policies within the Plan. However, increased employment floorspace would lead to increased employment opportunities in the district which would contribute to sustaining vibrant communities.</p>
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy
<p>Green</p> <p>Although the 41,000sqm of employment floorspace proposed in this policy is this policy proposes a quantum of development that is unlikely to meet the full employment needs of the district, this is a minimum figure and therefore, subject to other relevant policies in the Plan, potentially allows for more than 41,000sqm. It is considered that, given the constraints in the district, the policy still takes a proactive approach to the provision of a significant amount of new employment generating floorspace in the district which will help increase job opportunities. This will result in a long-term positive impact on this objective.</p>
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development
<p>Amber</p> <p>The three main sites referred to in this policy for significant levels of new employment generating floorspace all have significant flood risk issues (see the Sequential and Exception Test for more</p>

details). However, it should be noted that employment is a 'less vulnerable' use in relation to flood risk. Flood Risk Assessments would be required for any development on these sites and appropriate flood mitigation measures would also need to be incorporated into any new development. Although, the Plan as a whole aims to avoid, reduce and manage flood risk, it is not possible to avoid flood risk entirely while trying to meet the development needs of the district.

18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres

Green
New employment development in the district, including at Shoreham Harbour, Shoreham Airport and New Monks Farm could benefit the vitality and viability of existing centres, particularly Shoreham and Lancing town centres, through increased footfall.

19. Create places and spaces and buildings that work well, wear well and look good

This objective is addressed by other policies within the Plan.

20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs

This objective is addressed by other policies in the Plan.

21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy

This objective is addressed by other policies in the Plan.

Conclusion

Amber
This policy would have a number of long-term permanent social and economic benefits. However, there is potential for conflict with a number of environmental objectives including Objective 2 (Water Quality), Objective 4 (Biodiversity), Objective 5 (Historic Environment), Objective 6 (Countryside) and Objective 8 (Pollution). Nevertheless, it is considered that any potential impacts could be mitigated.

SA of Policy 5 (New Monks Farm, Lancing) to assess the impact of Main Modifications 8, 9 & 10 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources

This objective is addressed by other policies in this Plan..

2. Protect and enhance water quality and encourage the sustainable use of water

This objective is addressed by other policies in this Plan.

3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials

Green
Although this site is greenfield, the plan only aims to deliver greenfield sites in addition to, rather than instead, of brownfield sites. There are not enough available brownfield sites in the district to meet the district's housing needs and therefore greenfield sites are also necessary.

4. Conserve, protect and enhance biodiversity and habitats

Amber
New Monks Farm is a large green field site and development will inevitably have a short-term impact on biodiversity. However, the policy identifies a number of key ecological areas within the site and seeks to ensure that these will be protected and enhanced as part of the development. The policy also requires that an ecological management plan is produced at the planning application stage.

5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes

Amber
New Monks Farm is located within the Lancing-Shoreham Local Green Gap which forms part of the historic character of the district. However, the policy aims to ensure that the development respects this gap and also states that strategically sited blocks of woodland should be provided to screen views of development.

6. Protect and enhance the countryside

Amber
New Monks Farm is within an area of countryside within the Lancing-Shoreham Local Green Gap so

development will inevitably have an impact on the countryside. However, the policy aims to ensure that development respects this gap and also states that strategically sited blocks of woodland should be provided to screen views of development. Such blocks of woodland would also help to reduce the impact of the development on views from the South Downs National Park. The policy also requires that a landscape management plan is produced at the planning application stage.
7. Protect and enhance public open space / green infrastructure and accessibility to it
Green The policy states that an informal country park should be provided as part of the development as well as other open space and recreation areas. This would result in major enhancements to public open space as this part of the Lancing-Shoreham gap is currently inaccessible to the public. The informal country park would form a significant part of the district's green infrastructure network.
8. To reduce pollution and the risk of pollution to air, land and water
Amber New development at New Monks Farm will inevitably increase the amount of vehicle movements in the district which is a major source of air pollution. However, the policy aims to ensure that improved public transport and pedestrian and cycle links are provided as part of the development which could help reduce this impact.
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events
Green The policy requires that all forms of flooding on the site are mitigated without worsening flood risk elsewhere. It also states that opportunities to reduce flood risk elsewhere should be sought. This includes reducing the flood risk at Withy Patch gypsy and travellers site through its relocation westward. <u>As part of the Flood Risk Assessment, the policy also requires a strategy for the long term management and maintenance of drainage on the site.</u>
10. To improve health and wellbeing and reduce inequalities in health
Green The policy requires that an informal country park be provided as part of the development as well as other open space and recreation. This would help to improve health and wellbeing in the district.
11. To reduce crime, the fear of crime and antisocial behaviour
This objective is addressed by other policies within the Plan.
12. To promote sustainable transport and reduce the use of the private car
Amber New development at New Monks Farm will inevitably increase the amount of vehicle movements in the district. However, the policy aims to ensure that improved public transport and pedestrian and cycle links are provided as part of the development which could help reduce this impact.
13. To reduce poverty, social exclusion and social inequalities
Green The policy includes the provision of <u>a minimum of</u> 600 new homes (30% of which are to be affordable), approximately <u>a minimum of</u> 10,000sqm of employment generating floorspace, as well as a neighbourhood centre/community hub which would contribute to this objective.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
Green The policy includes provision for a significant amount of homes (<u>a minimum of</u> 600) which would make a major contribution to meeting the district's housing need. This would include a mix of types and tenures and 30% of these houses would be affordable.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals
Green The policy includes provision of a neighbourhood centre/community hub, an informal country park and other open space/recreation which would all make a significant contribution to this objective.
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy
Green The policy includes the provision of around <u>a minimum of</u> 10,000sqm of employment generating floorspace which would contribute to this objective.
In the short term the development would temporarily benefit the economy through providing jobs

during the construction phase. Additionally, new housing would benefit local businesses by providing an additional labour force in the area.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development
Amber New Monks Farm is located within flood zones 3a, 2, and 1 and also suffers from surface water and groundwater flooding. Due to the limited supply of land in the district, in order to try and meet the district's housing needs as far as is possible, some land at risk of flooding has been allocated in the Plan, including this site. The selection of sites has been underpinned by a Sequential and Exception test in line with the NPPF to avoid flood risk as far as is practicable. The policy requires that all forms of flooding are mitigated without worsening flood risk elsewhere. It also states that opportunities to reduce flood risk elsewhere should be sought. <u>As part of the Flood Risk Assessment, the policy requires a strategy for the long term management and maintenance of drainage on the site.</u>
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres
Green New housing and employment development at New Monks Farm is likely to improve the vitality and viability of adjacent town centres, particularly Lancing town centre, through increased footfall. The policy also states that a community hub and a school will be provided as part of the development which will help improve the range and accessibility of key services and facilities.
19. Create places and spaces and buildings that work well, wear well and look good
This objective is addressed by other policies within the Plan.
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs
Green The policy includes the provision of a new school (as well as additional land for an expansion of the school in the future) as part of the development at New Monks Farms which could contribute to this objective.
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy
This objective is addressed by other policies within the Plan.
Conclusion
Amber This policy would have a number of long-term positive social and economic benefits but there is some potential for conflict with a number of environmental objectives regarding biodiversity, historic environment, countryside, pollution and flood risk. It is considered that such potential impacts could be mitigated but these issues would need to be addressed carefully at the planning application stage.

SA of Policy 6 (West Sompting) to assess the impact of Main Modification 13 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources
This objective is addressed by other policies in this Plan.
2. Protect and enhance water quality and encourage the sustainable use of water
This objective is addressed by other policies in this Plan.
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials
Green Although this site is greenfield, the plan only aims to deliver greenfield sites in addition to, rather than instead of, brownfield sites. There are not enough available brownfield sites in the district to meet the district's housing needs and therefore greenfield sites are also necessary.
4. Conserve, protect and enhance biodiversity and habitats
Amber Sompting North and Sompting Fringe are green field sites and development will inevitably have a

short-term impact on biodiversity. However, the policy identifies a number of key ecological areas within the sites including Cokeham Brooks SNCI and seeks to ensure that these areas will be protected, enhanced and extended as part of the development. The policy requires an ecological management plan to be produced at the planning application stage.
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes
Amber Sompting North and Sompting Fringe are located within the Lancing/Sompting – Worthing Local Green Gap which forms part of the historic character of the district. The gap also provides the setting for Sompting Village Conservation Area. However, the policy aims to ensure that the development respects this gap and also states that landscaped buffer should be provided along the western boundary of the development. Both Sompting North and Sompting Fringe are far enough from Sompting Village Conservation Area so as not to have any significant impacts.
6. Protect and enhance the countryside
Amber Sompting North and Sompting Fringe are located within the countryside within the Lancing/Sompting – Worthing Local Green Gap. However, the policy aims to ensure that the development respects the landscape and states that a landscape buffer should be provided along the western boundary of the site to screen development. The policy also requires a site-wide landscape management plan to be produced at the planning application stage.
7. Protect and enhance public open space / green infrastructure and accessibility to it
Green The policy specifies that as part of the development, open space and recreation areas, playing pitches, and a community orchard should be provided as well as a nature conservation area and public access to and across the Lancing/Sompting-Worthing Local Green Gap, all of which would make a significant contribution to this objective.
8. To reduce pollution and the risk of pollution to air, land and water
Amber New development at Sompting North and Sompting Fringe will inevitably increase the amount of vehicle movements in the district which is a major source of air pollution. However, the policy aims to ensure that improved public transport and pedestrian and cycle links are provided as part of the development which could help reduce this impact. The policy requires a transport assessment to be undertaken.
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events
Green The policy requires that all forms of flooding are mitigated without worsening flood risk elsewhere. It also states that opportunities to reduce flood risk elsewhere should be sought. The policy requires that a flood risk assessment is undertaken at the planning application stage.
10. To improve health and wellbeing and reduce inequalities in health
The policy requires that, as part of the development, open space and recreation areas, playing pitches, and a community orchard/growing space are provided, as well as pedestrian and cycle access to and across the Local Green Gap. This could help to improve health and wellbeing in the district.
11. To reduce crime, the fear of crime and antisocial behaviour
This objective is addressed by other policies within the Plan.
12. To promote sustainable transport and reduce the use of the private car
Amber New development at West Sompting will inevitably increase the amount of vehicle movements in the district. However, the policy aims to ensure that improved public transport and pedestrian and cycle links are provided as part of the development which could help reduce this impact. The policy requires a transport assessment to be undertaken.
13. To reduce poverty, social exclusion and social inequalities
Amber The policy proposes a minimum of 480 new dwellings, 30% of which would be affordable, as well as provision for a new community facility which would help meet this objective. .
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
Green

The policy includes provision for a significant amount of homes (a minimum of 480) which would make a major contribution to meeting the district's housing need. This would include a mix of types and tenures and 30% of these houses would be affordable.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals
Green The policy requires that open space and recreation areas, playing pitches, and a community orchard/growing space are provided as well as a pedestrian and cycle way to and across the Lancing/Sompting-Worthing gap which would help contribute towards creating and sustaining vibrant communities. Additionally, the policy requires a range of different types and tenures of housing as well as a mix of affordable and market housing.
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy
Green In the short term the development would temporarily benefit the economy through providing jobs during the construction phase. Additionally, new housing would benefit local businesses by providing an additional labour force in the area.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development
Green The proposed development would be within flood zone 1 (low probability). There are some potential surface water and groundwater issues on the site however. The policy requires that all forms of flooding are mitigated without worsening flood risk elsewhere. It also states that opportunities to reduce flood risk elsewhere should be sought. The policy requires that a flood risk assessment is undertaken at the planning application stage.
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres
Green New housing at Sompting Fringe and Sompting North is likely to improve the vitality and viability of adjacent town centres, particularly Lancing town centre, through increased footfall, although it is expected that a significant amount of residents will go to Worthing to shop given its close proximity.
19. Create places and spaces and buildings that work well, wear well and look good
This objective is addressed by other policies within the Plan.
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs
This objective is primarily addressed by other policies within the Plan although the policy does specifically require financial contributions towards education.
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy
This objective is addressed by other policies within the Plan.
Conclusion
Amber This policy would have a number of long-term positive social and economic benefits as well as some environmental benefits, but there is some potential for conflict with a number of objectives including the historic environment, countryside, pollution and sustainable transport. It is considered that such potential impacts could be mitigated but these issues would need to be carefully addressed at the planning application stage.
Recommendation
No changes recommended to policy.

SA of Policy 7 (Shoreham Airport) to assess impact of Main Modifications 19 & 20 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources
This objective is addressed by other policies within the Plan.
2. Protect and enhance water quality and encourage the sustainable use of water
Amber The proposed allocation at Shoreham Airport is located adjacent to the Adur Estuary SSSI. Under the

Water Framework Directive, the Adur Estuary is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts of the development on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict with this objective. The policy however recognises this and requires mitigation measures to ensure that development does not impact on the Adur Estuary SSSI.

3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials

Green

The site constitutes previously developed land and would therefore contribute to this objective.

4. Conserve, protect and enhance biodiversity and habitats

Amber

The proposed allocation at Shoreham Airport is located adjacent to the Adur Estuary SSSI. As a result, new development could have potential impacts on biodiversity and habitats within and adjacent the River. However, the policy recognises this potential impact and states that mitigation measures will be required to ensure that new development at the airport doesn't impact on the ecological value of the airport or the adjacent Adur Estuary SSSI. The policy also states that ecological enhancements should be incorporated as an integral part of the development.

5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes

Amber

Given that the allocation at Shoreham Airport is adjacent to the River Adur and within the Local Green Gap, it would be likely to have some negative impacts on the historic setting and landscape of the district. Additionally, for new development to take place at the airport, a new access from the A27 will be required which could add to any negative impacts on the historic landscape. The impacts of development may be mitigated to some extent however through careful design. The policy states that new development must be designed to minimise its impact on the open nature of the Lancing-Shoreham Local Green Gap.

The Terminal Building at Shoreham Airport is Grade II* Listed and there is a hangar adjacent that is Grade II Listed. The proposed new development is a significant distance from these buildings but it is vital to ensure that key views of these buildings are not obstructed from key viewpoints within the SDNP, from the Old Toll Bridge and the footpath and cycleway adjacent the river.

In the northern part of the airport is a Scheduled Ancient Monument, the setting of which could also be detrimentally impacted through the provision of a new access to the airport from the A27. This will need to be mitigated through the location and design of any new roundabout.

6. Protect and enhance the countryside

Amber

Given that the allocation at Shoreham Airport is adjacent to the River Adur and within the Local Green Gap that separates Shoreham and Lancing, it would be likely to have some negative impacts on the landscape/countryside. Additionally, for new development to take place at the airport, a new access from the A27 will be required which could add to any impacts on the landscape/countryside. The impacts can be mitigated to some extent however, through careful design. The policy states that new development must be designed to minimise its impact on the landscape.

The Landscape and Ecological Survey of Key Sites Within the Adur District (2012) states that the completely flat, open and ordered airport landscape contrasts with the natural curve and textured pattern of the River Adur and its mudflats alongside. The area makes a strong contribution to the impression of open, extensive greenspace in the Lancing-Shoreham Local Green Gap, enhancing the sense of separation between Shoreham and Lancing and providing a striking landscape setting for the lower stretches of the River Adur as it winds towards the sea. The study assesses the overall landscape sensitivity of Shoreham Airport as high. Therefore development at the airport needs to be particularly sensitive to the open character of the area.

Any new development at the airport would be visible in key views from the South Downs National

Park. Again, this could be mitigated to some extent and the policy seeks to ensure such mitigation takes place.

7. Protect and enhance public open space / green infrastructure and accessibility to it

Amber

The Adur Estuary SSSI is a key piece of green infrastructure and there is potential for new development at the airport to impact on this area visually and in terms of potential pollution impacts due to the close proximity of development to the river. However, the policy states that mitigation measures will be required to ensure that new development at the airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI. The policy also states that opportunities for ecological enhancements should also be sought through new development.

The policy also seeks to ensure that any new access on the A27 provides pedestrian, cycle and equestrian access across the A27 to the South Downs National Park.

8. To reduce pollution and the risk of pollution to air, land and water

Amber

New employment development at the airport is likely to result in increased car movements which could have a negative impact on air pollution. This could be mitigated to some extent through sustainable transport improvements to/from the airport and the policy seeks to ensure that sustainable transport measures are provided.

The proposed indicative allocation at Shoreham Airport is located adjacent to the Adur Estuary SSSI. Under the Water Framework Directive, the River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict with this objective as a result of new development immediately adjacent to the SSSI. Development within the proposed allocation at Shoreham Airport could not commence until construction of the Adur Tidal Walls Scheme which could help to reduce the potential for pollution of the water body. The policy states that mitigation measures will be required to ensure that new development at the airport does not impact on the ecological value of the airport itself or the adjacent Adur Estuary SSSI.

9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events

Green

The policy ensures that no development in the north east corner can take place until the relevant section of the Shoreham Adur Tidal Walls on the west bank has been completed. It also states that flood mitigation measures will need to be incorporated into the development in order to further reduce flood risk and that a Flood Risk Assessment will be required at the planning application stage.

10. To improve health and wellbeing and reduce inequalities in health

This objective is addressed by other policies within the Plan.

11. To reduce crime, the fear of crime and antisocial behaviour

This objective is addressed by other policies within the Plan.

12. Promote sustainable transport and reduce the use of the private car

Amber

Although approx. **a minimum of** 15,000 sqm of employment floorspace will inevitably result in more car movements to and from the site, the policy seeks to ensure that sustainable transport initiatives are incorporated into any development including improvements to adjacent footpaths, cycle ways and bus transport linking the Airport to the A259 coast road and Shoreham town centre. The policy also ensures that a travel plan is provided for any planning application.

It should be noted that new employment opportunities in the district may help reduce the number of people in the district out-commuting, potentially reducing some vehicle movements.

13. To reduce poverty, social exclusion and social inequalities

Green

Approximately A minimum of 15,000sqm of employment floorspace is proposed at Shoreham Airport which would provide a significant number of new job opportunities in the district and would therefore help to contribute to this objective.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
This objective is addressed by other policies within the Plan.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals
This objective is addressed by other policies within the Plan.
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy
Green This policy would make a long-term permanent contribution to this objective by providing approximately a minimum of 15,000sqm of employment floorspace as well as contributing to supporting infrastructure including a new access from the A27 serving both the Airport and New Monks Farm. In the short term the development would temporarily benefit the economy through providing jobs during the construction phase.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development
Amber The whole of Shoreham Airport is currently located within Flood Zone 3b (functional floodplain). However, the policy seeks to ensure that no development takes place within the allocated area until the Shoreham Tidal Walls are constructed as the tidal walls would change the Flood Zone designation from 3b (functional floodplain) to 3a (high probability). The policy also states that flood mitigation measures will need to be incorporated into the development in order to further reduce flood risk as well as stating that a Flood Risk Assessment will be required at the planning application stage. It should also be noted that employment development is defined as 'less vulnerable' in the NPPF. Nevertheless, it is considered that a significant amount of employment development within an area designated Flood Zone 3a is not entirely consistent with this objective. Please see the Sequential and Exception Test for more details on flood risk.
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres
Green New employment development would be likely to benefit existing centres, particularly Shoreham town centre which is relatively close to the Airport, as the more people there are working in the area, the more they are likely to visit the town centres. However, this would rely on improved sustainable transport links to Shoreham town centre which are promoted in the policy.
19. Create places and spaces and buildings that work well, wear well and look good
Amber Although this issue is primarily addressed by other policies within the Plan, the policy seeks to ensure that development will be designed to reflect the open nature of the Shoreham-Lancing Green Gap and ensure key views are retained. However, it must still be recognised that the airport is an extremely sensitive location environmentally.
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs
This objective is addressed by other policies in the Plan.
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy
This objective is addressed by other policies in the Plan.
Conclusion

Amber

This policy would have a number of social and economic benefits but there is potential for negative impacts on the environmental objectives including water quality, biodiversity, the countryside, historic environment, green infrastructure, pollution, and minimising flood risk. The policy aims to minimise/mitigate these impacts as much as possible but these issues would need to be carefully addressed at the planning application stage.

SA of Policy 8 (Shoreham Harbour) to assess impact of Main Modification 22 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources

Green

Although this objective is also addressed by other policies within the Plan, this policy specifically refers to supporting Shoreham Port in exploring opportunities for sustainable energy generation. The policy also states that development within Shoreham Harbour will be expected to support low and zero carbon decentralised energy generation, in particular heat networks, and required to either connect, where a suitable system is in place or design systems so they are compatible with future connection to a network.

2. Protect and enhance water quality and encourage the sustainable use of water

Amber

Although this objective is partly addressed by other policies within the Plan, this policy sets out the priority to identify and where appropriate accommodate the future capacity requirements for the Waste Water Treatment Plant (WWTP) which is important given the role of WWTPs in improving water quality. However, given that the regeneration of Shoreham Harbour would involve a significant amount of new waterfront development, there is potential for pollution of the Adur Estuary SSSI. Under the Water Framework Directive, the Adur Estuary is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict. The policy states that all development will be required to minimise impacts on the River Adur SSSI. Additionally, through the relocation of industrial uses along the western arm to other areas in the district and the opportunities for remediation of contamination, the proposed redevelopment at Shoreham Harbour could provide long term benefits for the River Adur.

3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials

Green

Shoreham Harbour comprises a large area of previously developed land and would be consistent with this objective.

4. Conserve, protect and enhance biodiversity

Amber

Although this objective is partly addressed by other policies within the Plan, this policy sets out priorities for the Harbour Mouth including environmental and landscaping improvements to improve connections between Shoreham town centre, Shoreham Beach and the Fort. These improvements could benefit biodiversity in the area. Additionally, the policy also sets out priorities for Southwick Waterfront and Fishersgate including enhancing biodiversity by creating and improving habitats and improved green infrastructure links, including landscape enhancements to social housing estates. However, it is worth noting the potential conflict between improving connections to the Shoreham Beach LNR which could result in an increase of visitors to it and the impact this could have on the biodiversity there. A significant amount of the site is located adjacent to the River Adur SSSI. The policy states that all development will be required to protect and enhance the area's important wildlife habitats and in particular minimise impacts on the River Adur SSSI. Additionally, through the relocation of industrial uses along the western arm to other areas in the district and the opportunities for remediation of contamination, the proposed redevelopment at Shoreham Harbour could provide long term benefits for the River Adur. .

5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes

Green

This objective is partly addressed by other policies within the Plan. However, one of the priorities of the policy is to support the comprehensive restoration of Shoreham Fort which is a Scheduled Ancient Monument (SAM).

6. Protect and enhance the countryside

Green

Shoreham Harbour comprises a large area of previously developed land within the urban area. Provision of housing at the Harbour will, to some extent, help reduce the longer term pressure on greenfield sites within the countryside for housing and employment provision. Therefore, this policy is consistent with this objective.

7. Protect and enhance public open space / green infrastructure and accessibility to it

Green

The regeneration of Shoreham Harbour within Adur primarily proposes the relocation of a number of non-port related industrial uses and their replacement with new housing, modern employment facilities, leisure, tourism, community uses etc. This would not involve the loss of any open space or key areas of green infrastructure. The policy proposes access improvements to the waterfront and areas such as Shoreham Beach and Southwick Beach which are consistent with this objective. Environmental and landscaping improvements are proposed at the Harbour Mouth area. A riverside walk/cycle way is also proposed as part of a comprehensive flood defence solution. The policy also states that as part of new development, north-south links will be improved to enhance access to greenspace in the rest of the district including the South Downs National Park.

8. To reduce pollution and the risk of pollution to air, land and water

Amber

Although this objective is partly addressed by other policies within the Plan, with regard to water pollution issues this policy sets out the priority to identify, and where appropriate, accommodate the future capacity requirements for the Waste Water Treatment Plant (WWTP) which is important given the role of WWTPs in improving water quality. However, given that the regeneration of Shoreham Harbour would involve a significant amount of new waterfront development there is potential for water pollution to the River Adur. Under the Water Framework Directive, the River Adur is classified as a 'Transitional Water Body' of 'moderate' quality with the aim of no deterioration of that quality (as a minimum). Potential impacts on the quality of the waterbody would need to be addressed at the design stage but it should be noted that there is potential for conflict. The policy states that all development will be required to minimise impacts on the River Adur SSSI. Additionally, through the relocation of industrial uses along the western arm to other areas in the district and the opportunities for remediation of contamination, the proposed redevelopment at Shoreham Harbour could provide long term benefits for the River Adur.

A significant amount of new development is proposed at Shoreham Harbour which is likely to increase car movements and also potentially impact on the Shoreham Harbour and Southwick AQMAs. The policy currently says relatively little regarding sustainable transport improvements although this issue is partly addressed by other policies within the Local Plan.

Additionally, the regeneration of the Harbour promotes a thriving working port as well as residential development and other uses. There could be a potential conflict between residential and port uses in relation to noise issues. These would need to be considered carefully at the design stage. However, the redevelopment of the western arm provides the opportunity to relocate existing noisy and unsightly uses which currently have impacts on adjacent residents.

9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events

Green

This issue is addressed primarily by other policies in the Local Plan. However, one of the priorities of the policy is to deliver a comprehensive flood defence solution.

10. To improve health and wellbeing and reduce inequalities in health

Green

The policy includes improved access to the waterfront, the beaches and improvements to pedestrian walkways and cycle ways as well as enhanced leisure opportunities which will have a positive impact on this objective. Improving existing links is particularly important for the regeneration of Shoreham Harbour as opportunities for new large areas of open space will be limited. The policy states that as

part of new development, north-south links will be improved to enhance access to greenspace in the rest of the district including the South Downs.
11. To reduce crime, the fear of crime and antisocial behaviour
This objective is addressed by other policies within the Plan.
12. Promote sustainable transport and reduce the use of the private car
Amber This objective is partly addressed by other policies in the Plan. The policy promotes improvements to riverside walks and cycle ways which could encourage walking and cycling over other forms of transport and contribute to this objective. The policy also states that a Transport Strategy will be produced to mitigate impacts on the highway network and to promote sustainable travel behaviours.
13. To reduce poverty, social exclusion and social inequalities
Green A significant number of new jobs would be provided as part of the regeneration of Shoreham Harbour which could help to reduce poverty in the longer term. Additionally, the policy promotes new residential development and community facilities which could help reduce social exclusion and inequalities.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
Green This policy proposes 1100 new dwellings up to 2031 which would have a significant positive impact on this objective.
15. To create and sustain vibrant communities which recognize the needs and contribution of all individuals
Green A mix of uses including residential, community, leisure and employment are proposed as part of the regeneration of Shoreham Harbour as well as improved walkways and cycle ways. As a result, this policy would have a positive impact on this objective.
16. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy
Green The policy provides for a minimum of 16,000sqm of new employment generating uses to balance housing delivery at the Harbour. The policy also supports Shoreham Port Authority in improving operational efficiencies and developing new trade. These measures would have a positive impact on this objective. The policy would also have short-term temporary benefits for the economy through the construction process.
17. Avoid, reduce and manage the risk from all sources of flooding to and from the development
Amber Significant parts of Shoreham Harbour (including within the western arm where residential uses are proposed) are within areas designated as having a high probability (Flood Zone 3a) or medium probability (Flood Zone 2) of flooding from tidal sources. Although the policy does refer to an improved flood defence network, development within this location would have potential to conflict with this objective. The site also has a high potential for ground water flooding. A flood risk assessment would be required for any new development at the Harbour and appropriate flood mitigation measures would need to be incorporated into any new development. The policy states that a priority for the western arm is to deliver a comprehensive flood defence solution.
18. Improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres
Green Significant amounts of new housing and employment at Shoreham Harbour would bring more people into Shoreham-By-Sea and Southwick town centres and increase their vitality and viability. The policy specifically only mentions the provision of small-scale ancillary retail, restaurants and cafes, leisure

and tourism uses to ensure that trade isn't drawn from the town centre.
19. Create places and spaces and buildings that work well, wear well and look good
Green Although this objective is partly addressed by other policies in the Plan, the policy encourages environmental and landscape improvements, improvements to legibility, permeability and connectivity through high quality building design, as well as new cycle paths and walkways which would have a positive impact on this objective.
20. Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs
This objective is addressed by other policies within the Plan.
21. Reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy
This objective is addressed by other policies within the Plan.
Conclusion
Amber This policy generally scores positively as it would have a number of long-term social, economic and environmental benefits. There is potential for conflict with a number of environmental objectives including water quality, biodiversity, pollution, and flood risk, however the policy seeks to address these conflicts and it is considered that these potential impacts can be mitigated. These issues would need to be carefully addressed at the planning application stage.

SA of Policy 13 (Adur's Countryside and Coast) to assess the impact of Main Modification 27 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources
This objective is addressed by other policies within the plan.
2. Protect and enhance water quality and encourage the sustainable use of water
This objective is addressed by other policies within the plan.
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials
Green This policy seeks to restrict the amount of development in the countryside. As a result, the policy would guide development towards the Built Up Area which is likely to encourage the re-use of previously developed land.
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats
Green This policy seeks to protect the countryside and the setting of the South Downs National Park, improve green infrastructure and ensure that new development respects the biodiversity and tree cover of the area. This will all have a positive impact on this objective.
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes
Green By protecting the countryside, the historic settlement pattern of the district will, to some extent, be maintained. The policy also states that any new development in the countryside must respect the heritage and local vernacular of the area, as well as the setting of the district and the South Downs National Park. The policy would therefore have a positive impact on this objective.
6. Protect and enhance the countryside
Green The policy directly addresses this objective and would therefore have a positive impact on it.
7. Protect and enhance public open space / green infrastructure and accessibility to it
Green

<p>This policy seeks to protect the countryside which is an important part of the green infrastructure network. It also states that improvements to green infrastructure, including enhanced pedestrian, cycle and equestrian access, and better access for those with mobility difficulties will be supported. The policy would therefore have a positive impact on this objective.</p>
<p>8. To reduce pollution and the risk of pollution to air, land and water.</p>
<p>Green This policy seeks to restrict the amount of development that takes place in the countryside. By ensuring that large parts of the countryside are not developed, this would restrict the amount of development that takes place across the district which would also go some way to reducing further increases in car use and congestion on the highway network which is a significant source of air pollution. Potential noise pollution would also be reduced as the protection of the countryside would allow for more tranquil areas to be retained.</p>
<p>9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events</p>
<p>This objective is addressed by other policies within the Plan.</p>
<p>10. To improve health and wellbeing and reduce inequalities in health</p>
<p>Green Through protecting the countryside and improving links to, from and through it, as well as improving access to the South Downs National Park, this policy will have a positive impact on this objective.</p>
<p>11. To reduce crime, the fear of crime and antisocial behaviour</p>
<p>This objective is addressed by other policies within the Plan.</p>
<p>12. To promote sustainable transport and reduce the use of the private car</p>
<p>Green This policy supports enhancements to pedestrian and cycle links in the countryside so it would contribute to achieving this objective.</p>
<p>13. To reduce poverty, social exclusion and social inequalities</p>
<p>This objective is addressed by other policies within the Plan.</p>
<p>14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing</p>
<p>Red By restricting the amount of development in the countryside, this policy would limit the amount of land available for new housing and would therefore conflict with this objective.</p>
<p>15. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.</p>
<p>This objective is addressed by other policies within the Plan.</p>
<p>16. To promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.</p>
<p>Amber By restricting the amount of development in the countryside, this policy would limit the amount of land available for new employment floorspace which would conflict with this objective. On a positive note, however, it supports future development at Ricardo, an important local employer, subject to impact on the countryside. It should also be considered that businesses have a number of requirements when considering where to locate and for some businesses, the quality and attractiveness of an area is often one of these requirements. Therefore, to develop the countryside and erode the character of the area may prevent some businesses moving to Adur.</p>
<p>17. To avoid, reduce and manage the risk from all sources of flooding to and from the development</p>
<p>Green</p>

There are significant surface water and ground water flooding issues in Adur and the areas of countryside within Adur help with the storage and drainage of surface water, groundwater and fluvial flooding.

Additionally, the policy states that any development on the coast will need to have regard to the need to maintain and improve sea defences.

18. To improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres

This objective is addressed by other polices within the plan.

19. To create places and spaces and buildings that work well, wear well and look good.

This objective is addressed by other polices within the plan.

20. To raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.

This objective is addressed by other policies within the plan.

21. To reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy.

This objective is addressed by other policies within the plan.

Conclusion

Amber

This policy has a significant number of environmental benefits but scores negatively in relation to housing provision.

SA of Policy 22 (Affordable Housing) to assess the impact of Main Modification 34 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources

This objective is addressed by other policies within the plan and Part L of the Building Regulations.

2. Protect and enhance water quality and encourage the sustainable use of water

This objective is addressed by other policies within the plan.

3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials

This objective is addressed by other policies within the plan.

4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats

This objective is addressed by other policies within the plan.

5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes

This objective is addressed by other policies within the plan.

6. Protect and enhance the countryside

This objective is addressed by other policies within the plan.

7. Protect and enhance public open space / green infrastructure and accessibility to it

This objective is addressed by other policies within the plan.

8. To reduce pollution and the risk of pollution to air, land and water.

This objective is addressed by other policies within the plan.

9. To ensure that all developments have taken into account the changing climate and are adaptable

and robust to extreme weather events
This objective is addressed by other policies within the plan.
10. To improve health and wellbeing and reduce inequalities in health
Green An increase in supply of affordable housing may result in an improved quality of life for some households.
11. To reduce crime, the fear of crime and antisocial behaviour
This objective is addressed by other policies within the plan.
12. To promote sustainable transport and reduce the use of the private car
This objective is addressed by other policies within the plan.
13. To reduce poverty, social exclusion and social inequalities
Green This policy is specifically intended to ensure that a percentage 30% percent of housing (on sites of 11 dwellings or more) is built to meet the needs of households on lower incomes, resulting in a mix of market and affordable homes on site , and that on larger sites a mixed development of market and affordable homes should be provided. <u>It should be noted that a significant amount of residential development in the district (94%) is on sites of less than 11 dwellings which would result in a large amount of development not providing affordable housing. However, on the whole, the policy will therefore make a positive contribution to achieving this objective, particularly when applied to the strategic allocations/broad locations in the Plan. Given that Adur District Council's existing 'Planning Contributions for Infrastructure Provision' Interim Planning Guidance document (2013) requires 30% affordable housing on sites of 15 or more, this policy would result in the provision of a greater proportion of affordable housing than the current interim guidance.</u>
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
Green This policy is specifically intended to ensure that a percentage 30% percent of housing (on sites of 11 dwellings or more) is built to meet the needs of households on lower incomes, resulting in a mix of market and affordable homes on site , and that on larger sites a mixed development of market and affordable homes should be provided. <u>It should be noted that a significant amount of residential development in the district (94%) is on sites of less than 11 dwellings which would result in a large amount of development not providing affordable housing. However, on the whole, the policy will therefore make a positive contribution to achieving this objective, particularly when applied to the strategic allocations/broad locations in the Plan. Given that Adur District Council's existing 'Planning Contributions for Infrastructure Provision' Interim Planning Guidance document (2013) requires 30% affordable housing on sites of 15 or more, this policy would result in the provision of a greater proportion of affordable housing than the current interim guidance.</u>
15. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.
Green This policy is specifically intended to ensure that a percentage of housing is built to meet the needs of households on lower incomes, and that on larger sites a mixed development of market and affordable homes should be provided. The policy will therefore make a positive contribution to the achievement of this objective.
16. To promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.
This objective is addressed by other policies within the plan.
17. To avoid, reduce and manage the risk from all sources of flooding to and from the development
This objective is addressed by other policies within the plan.

18. To improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres
This objective is addressed by other policies within the plan.
19. To create places and spaces and buildings that work well, wear well and look good.
This objective is addressed by other policies within the plan.
20. To raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.
This objective is addressed by other policies within the plan.
21. To reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy.
This objective is addressed by other policies within the plan.
Conclusion
Green This policy should ensure that an element of housing is provided for households on lower incomes and that a proportion of it is integrated with general market housing. This will contribute strongly to the achievement of several objectives concerned with social inclusion and integration.

SA of Policy 35 (Pollution and Contamination) to assess the impact of Main Modification 37 (See Table 2 for more information on the Main Modifications)

1. Increase energy efficiency and encourage the use of renewable energy sources
This objective is addressed by other policies within the plan and Part L of the Building Regulations.
2. Protect and enhance water quality and encourage the sustainable use of water
Green This policy seeks to ensure that development does not have a negative impact on will not result in a significant level of increased pollution of the water environment, including drinking water supplies.
3. Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials
This objective is addressed by other policies within the plan.
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats
Green This policy seeks to minimise pollution and its impact on the environment which would help to conserve and protect biodiversity in the long term.
5. Protect and enhance the historic environment including townscapes, buildings, archaeological heritage, parks and landscapes
Green This policy seeks to minimise pollution and its impact on the general environment which would contribute to this objective.
6. Protect and enhance the countryside
Green This policy seeks to minimise pollution and its impact on the general environment which would contribute to this objective.
7. Protect and enhance public open space / green infrastructure and accessibility to it
Green This policy seeks to minimise pollution and its impact on the environment so it would contribute to this objective.

8. To reduce pollution and the risk of pollution to air, land and water.
Green The policy specifically addresses this objective and makes reference to air, land and water pollution.
9. To ensure that all developments have taken into account the changing climate and are adaptable and robust to extreme weather events
Green By ensuring that new development does not result in unacceptable levels of pollution, the policy will contribute, in the long term, to reducing the impacts of climate change.
10. To improve health and wellbeing and reduce inequalities in health
Green This policy seeks to ensure that new development in the district does not result in unacceptable levels of pollution to air; land and water which will help contribute to this objective. In addition, it requires investigation and assessment of sites affected by potentially contaminated land to protect the health of future users of such sites.
11. To reduce crime, the fear of crime and antisocial behaviour
This objective is addressed by other policies within the plan.
12. To promote sustainable transport and reduce the use of the private car
Although there are strong links between reducing pollution and promoting sustainable transport, other policies in the plan, particularly the transport and accessibility policy, address this issue specifically.
13. To reduce poverty, social exclusion and social inequalities
This objective is addressed by other policies within the plan.
14. To meet the need for housing and ensure that all groups have access to decent and appropriate housing
Green By ensuring that new development is located in areas most suitable to its use to avoid risks from noise, air, water and light pollution, the policy will contribute to the provision of decent and appropriate housing. Investigation and assessment of sites affected by potentially contaminated land will also contribute to this objective.
15. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.
This objective is addressed by other policies within the plan.
16. To promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.
Green Ensuring new development minimises pollution will help to ensure new economic development is more sustainable.
17. To avoid, reduce and manage the risk from all sources of flooding to and from the development
Green This policy would contribute to this objective as, in the long term, the minimisation of pollution, particularly air pollution, which this policy would help to achieve, would help minimise the impacts of climate change which are closely linked to levels of flood risk.
18. To improve the range, quality and accessibility of key services and facilities, and ensure the vitality and viability of existing centres
This objective is addressed by other policies within the plan.
19. To create places and spaces and buildings that work well, wear well and look good.
Green This policy seeks to ensure that new development does not result in unacceptable levels of pollution

which would contribute to this objective.
20. To raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.
This objective is addressed by other policies within the plan.
21. To reduce the amount of domestic and commercial waste going to landfill in line with the waste management hierarchy.
This objective is addressed by other policies within the plan.
Conclusion
Green This policy would potentially contribute significantly to a range of objectives, both at the local and wider level.