



Sussex
Wildlife Trust

By email only

consultation@shorehamharbour.com

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Dear Shoreham Harbour Regeneration Team

Proposed Submission – Shoreham Harbour Regeneration Plan - Dec 2017

The following comments are made on behalf of the Sussex Wildlife Trust in relation to soundness and legal compliance with regards to biodiversity, of the proposed submission version of the **Shoreham Harbour Regeneration Plan**.

We welcome the production of a Joint Area Action Plan (JAAP) for this area and feel encouraged to see that some of our comments made back in the 2014 and 2016 consultation have been incorporated into the proposed submission. We see from the plan that a green infrastructure strategy is integral to the delivery of the JAAP. We strongly support the progressive approach being taken in the formulation of the green infrastructure strategy.

The evidence base for the JAAP includes a Green Infrastructure (GI) Study. Given the urban nature of the area, we are pleased that this GI study appreciates the importance of looking at green spaces, such as verges and green areas within housing estates. These types of green spaces are often key delivery areas for ecosystem services in urban settings, but are easily overlooked.

We hope that the authorities that make up this JAAP partnership will adopt a similar approach in their own GI strategies in emerging and adopted plans

Vision

Given the positive and progressive approach the JAAP is demonstrating for the integration of Natural Capital, we would encourage a clear reflection of this in the wording of the vision.

We suggest the following wording (addition in bold):

By 2032 Shoreham Harbour Regeneration Area will be transformed into a vibrant, thriving water front destination comprising a series of sustainable, mixed use developments alongside a consolidated and enhance Shoreham Port which will continue to play a vital role in the local economy.

[REDACTED]
[REDACTED] Chairman: Carole Nicholson Chief Executive: Dr. Tony Whitbread

The redevelopment of key areas of the harbour will provide benefits for the local community, **natural environment** and economy through increased investment, improved leisure opportunities, enhanced public realm and the delivery of critical infrastructure that will respond positively to climate change.

Strategic Objectives

Objective 1: Climate change, energy and sustainable building

We support the recognition in this objective that developments will need to incorporate innovative approaches to open space, biodiversity and green infrastructure.

This reflects the National Planning Policy Framework (NPPF) section 99 and 118

Objective 7: Natural Environment, Biodiversity and Green Infrastructure.

We strongly support the inclusion of this objective and welcome the changes to the beginning. This wording clearly communicates the aspirations of the plan and will also compliment the visions and objectives within the adopted Adur Local Plan. It will help to demonstrate the progressive nature of the JAAP and its understanding of emerging approaches reported on by the Natural Capital Committee.

Additionally, by incorporating the term 'net gains' it clearly matches the ethos of section 109 of the NPPF.

Area Wide Policies

SH1 Climate change, energy and sustainable building

The Sussex Wildlife Trust is supportive of this policy and the steps suggested in tackling climate change through sustainable building. Section 3.1.24 and 3.1.25 of the supporting text makes reference to the importance of photovoltaics and the potential for this power generation within the harbour area. We would encourage the council to consider specific wording to reflect this commitment in the policy.

SH6 Flood risk and sustainable development

Bullet point 12 of this policy highlights that "*where loss of habitat occurs due to construction of moorings or pontoons or from boats resting on intertidal habitat, creation of new compensatory habitat will be required.*"

There are existing constraints on the identification of compensatory habitats within the Adur Estuary and this should be addressed by the JAAP.

Given the scale of development in this area we do not think that it is acceptable to resort to only financial compensation for the management of existing habitat. Section 176 of the NPPF states *where safeguards are necessary to make a particular development accessible in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily.*

SH7 Natural Environment, Biodiversity and Green Infrastructure

The Sussex Wildlife Trust is supportive of this policy.

The Sussex Wildlife Trust welcomes the inclusion of wording that stipulates the importance of the green infrastructure strategy as an active strategy through the inclusion of wording which highlights mechanism for implementation. We feel that this delivers the ethos of section 114 of the NPPF.

We are really pleased to see bullet point 6 include a range of possible enhancements to the area and welcome the approach to make it clear that the measures to enhanced biodiversity are not limited to those stated in the policy. This will enable the policy to ensure that the most appropriate enhancements to a particular area at the time of actual development are used.

We are very encouraged to see bullet point 6 give clear recognition to the importance of off-site enhancements, through contributions to management and monitoring plans for local conservation sites such as Shoreham Beach Local Nature Reserve and Widewater Lagoon Local Nature Reserve. This inclusion shows an understanding of the important role these sites play in the vicinity of the JAAP.

To ensure that planning applications are determined with up to date environmental information as per section 165 of the NPPF, we suggest that the policy includes wording to reflect this in bullet point 4.

We suggest the following addition to the start of bullet point 4 (addition in bold):

All development **applications must be accompanied up to date ecological information to** ensure no net loss and seek to provide a net gain to biodiversity...

Bullet point 12 makes clear that development will need to connect to the sewerage system. The Sussex Wildlife Trust therefore assumes that this means that package treatment works will not be considered to be a suitable option for proposed developments. We would support this approach.

SH8 Recreation and Leisure

We welcome the recognition of green infrastructures multifunctional delivery with its presence in the recreation and leisure policy. This is support by section 109 of the NPPF.

Character Area Proposals

Aldrington Basin

We are pleased to see the area priorities make clear reference to the enhancement of biodiversity by creating and improving green infrastructure links, including a green corridor along the A259. (114 NPPF) It is apparent from the supporting text, section 4.2.25 through to 4.2.27, that there are good opportunities and intentions in this character area to deliver towards the green infrastructure vision for the area.

Policy CA2 Aldrington Basin

We are supportive of policy wording in bullet points 9 and 10 as we feel that this demonstrates a commitment to the delivery of natural capital in the form of biodiversity enhancements and green Infrastructure provision. (114 NPPF).

North Quayside and South Portslade

We are pleased to see the area priorities make clear reference to the enhancement of biodiversity by creating and improving green infrastructure links, including a green corridor along the A259.

As mentioned earlier in our consultation response, we are encouraged to see that the supporting text (4.3.19 through to 4.3.25) has identified a creative and relevant approach to delivering green infrastructure and improving the natural capital of the JAAP area. This in line with section 114 of the NPPF.

Policy CA3 North Quayside and South Portslade

The Sussex Wildlife Trust are supportive of the bullet points 10 through to 12 and hope that their implementation will lead to net gains for biodiversity as per para 109 of the NPPF.

Portslade and Southwick Beaches

We are encouraged to see the area's priorities pay attention to the need to protect and enhance important habitats and safeguarding of the beach area. The supporting text for this character area has utilised the information from the vegetated shingle assessment, which is welcomed as an informative evidence document in the formulation of this plan. We are pleased to see the recognition of Basin Road South SNCl as the largest example of vegetated shingle in Brighton and Hove. We hope this site can be seen as a starting point for vegetated shingle enhancements along this stretch of beach, as recommended in the 2015 Assessment of Extent and Potential for Vegetated Shingle Creation at Southwick and Portslade Beaches

Policy CA4 Portslade and Southwick Beaches

We are supportive of bullet point 2 but would suggest that it could be strengthened by saying: The partnership will promote and deliver the enhancement and creation of vegetated shingle habitats to create a continuous corridor along the beaches through mechanisms such as developer contributions/106/CIL. It may also be appropriate to consider wording within the policy which recognises the benefit of interpretation of the vegetated shingle areas due to its sensitivity to disturbance by increased footfall.

Fishersgate and Southwick

Looking at the area priorities alongside the sites identified in the green infrastructure study, we are encouraged to see the potential to deliver a number of multifunctional benefits through green infrastructure

We support the statements in section 4.5.20 through to 4.5.24. We hope that the relationship between the partnerships will enable Shoreham Port Authority to manage and enhance this area for the benefit of ecology. We welcome this cooperation to deliver gains to the natural capital of the area. We welcome the creative approach of including the grassed spaces around the areas of social housing as part of the forthcoming GI strategy. We would hope that this not only brings ecological benefits but could offer the people living in those areas benefits from the formation of community gardens.

Policy CA5 Fishersgate and Southwick

We are supportive of the wording within the policy to provide improvements to the ecology and landscaping of this area. The only addition Sussex Wildlife Trust encourages is the provision of signage for interpretation of the marine environment as part of the redevelopment of the Lady Bee Marina: explanation of the impacts water users have on the marine environment and best practises to minimise these.

Harbour Mouth

Policy CA6 Harbour Mouth

The Trust welcomes bullet point 3 of the policy which ensures that the partnership will work to protect the Shoreham Beach LNR. Bullet point 4 also urges the promotion of interpretation of the marine environment and biodiversity. We encourage this approach and the intention to work with the local community to deliver towards paragraph 109 of the NPPF.

The Sussex Wildlife Trust would support positive signage for interpretation and understanding of vegetated shingle in particular highlighting it's international importance and sensitivities.

Western Harbour Arm

This character area appears to show the most considerable changes in terms of redevelopment and we are therefore encouraged that the area priorities do still show that enhancement of the natural environment will be a key priority of this area. In particular we welcome the recognition of the potential of this area to deliver net gains for biodiversity as stated in the area priorities and section 4.7.26 as per section 109 of the NPPF.

Section 4.7.27 is a positive approach to SuDS and we welcome the approach of rain gardens and green walls that can offer multifunctional benefits.

Policy CA7 Western Harbour Arm

Given the scale of development suggested in this character area, we support the approach in bullet point 17 to ensure that management agreements are in place as part of the planning application for sites of compensatory habitat. As mention in our response previously, opportunities for compensatory habitat such as intertidal mud are limited in the Adur Estuary and therefore we welcome a commitment to ensure long term integrity of wildlife habitats, as per section 99 of the NPPF.

Delivery and Implementation

It would be beneficially for the JAAP to include an appendix/live link with the relevant sections of the Adur and Brighton and Hove Infrastructure Delivery Plans.

We recognise that the supporting text in section 5.1.14 refers to essential infrastructure and that this includes green infrastructure. We therefore we feel it would be prudent to include it within section 5.1.20 which refers to requirements for major developments.

In conclusion

We are encouraged that the JAAP partnership has taken steps to have a consultation with an evidence base that has included the identification of GI assets early on in the process.

Ensuring that biodiversity and open spaces are adequately planned for at the start of this process will help to ensure that actions need to implement net gains for biodiversity can be identified and implemented by policy, Infrastructure Delivery Plans and other suitable mechanisms. The Sussex Wildlife Trust believes careful consideration of the Marine Strategy Framework and the Water Framework Directive is paramount to this plan and would like to see careful cooperation with the Adur and Ouse Catchment Partnership.

If you have any questions regarding our response we would be happy to discuss them with you. We

would like to continue to keep the dialogue with the partnership open to ensure positive progress for this plan on the Natural Environment.

Yours sincerely

Laura Brook
Conservation Officer