



# SHOREHAM HARBOUR REGENERATION

## SUSTAINABILITY APPRAISAL



PROPOSED MODIFICATIONS TO THE  
SHOREHAM HARBOUR  
JOINT AREA ACTION PLAN

SUBMISSION - MAY 2018



# **Sustainability Appraisal Addendum Report**

## **Proposed Modifications to the Shoreham Harbour Joint Area Action Plan**

**April 2018**

Prepared by Brighton & Hove City Council, April 2018

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## **1. INTRODUCTION**

### **1.1 Purpose of this report**

This document comprises the Sustainability Appraisal Addendum of the proposed modifications to the Shoreham Harbour Joint Area Action Plan.

This Sustainability Appraisal Addendum Report sets out the assessment findings and conclusions of the Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment, of the proposed modifications to the Submission Shoreham Harbour Joint Area Action Plan hereafter referred to as the 'JAAP'.

This SA Addendum Report does not repeat information produced in the SA of the Publication stage JAAP (August 2017) and should therefore be read alongside it. This report only considers the minor modifications and main modifications to the JAAP. The proposed modifications to the JAAP have arisen as a result of representations received during consultation at Publication stage that took place between November and December 2017.

### **1.2 Background**

The Shoreham Harbour Joint Area Action Plan (JAAP) is a local plan being prepared by the Shoreham Harbour Regeneration Partnership. This is made up of Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority. Once adopted, it will set the framework for regeneration of the harbour over the next 15-20 years.

### **1.3 Sustainability Appraisal undertaken on the JAAP**

At each stage of preparation, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken and the following documents have been produced and made available for consultation:

- Updated SA Scoping Report, 2012
- SA – Development Briefs (January/July 2013)
- Draft JAAP SA Report, March 2014
- Draft JAAP SA Report, November 2016
- Publication JAAP SA Report, August 2017

Additionally, some SA work took place during the 2008-2010 period that looked at early options for delivering higher quantum of development as required by the South East Plan.

### **1.4 Compliance with the SEA Directive**

The SA of the JAAP was designed and undertaken consistent with established SA practice and in compliance with the requirements of the SEA process which it integrates. This SA Addendum has also been undertaken in order to be consistent and in compliance with the

SEA process and regulations which requires SEA to be undertaken on modifications where they are significant in nature.<sup>1</sup>

The following table signposts to the components of the SA Report that make up the Environmental Report, as required by SEA, and to enable the reader to locate key components of this Appraisal process. This includes signposting to the 2017 SA Report, where information has not been repeated in or superseded by this 2018 Addendum Report.

**Table to show where and how the SEA/SA Requirements have been met**

<b>Requirements for Environmental Report under SEA/SA</b>	<b>Component of SA Report:- 2017 Report</b>	<b>Component of SA Report: 2018 Addendum</b>
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	The background to and vision of the regeneration project is included in Section 5. The Strategic Objectives are included in Section 5. Section 5.2 outlines the relationship with other plans. The SA objectives are included in Section 8.	n/a
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	A summary of baseline information collected during the scoping stage, as updated is included in Section 7. The likely evolution of existing conditions has been considered following the appraisal of policies and proposals in the Draft JAAP. These are included in Section 34.	The likely evolution of existing conditions has been considered following the appraisal of policies and proposals in the Draft JAAP. These are included in Section 6.3
c) The environmental characteristics of areas likely to be significantly affected;	Baseline information collected during the scoping stage is summarised in Section 7.	n/a
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 7 of this report outlines the sustainability problems and issues affecting the regeneration area. This includes environmental problems. In particular, biodiversity considerations can be found under section 7.3.23	n/a

<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 Regulation 5 (6)(b) "An environmental assessment need not be carried out for a minor modification to a plan or programme..."

	onwards.	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Section 6 outlines the policy context for the Draft JAAP.	n/a
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Assessments for policies SH2-SH10 and CA1-CA5 and CA7 summarised in sections 14-33. Full results in Appendix D Policy Appraisals.	Assessments for policies SH1 and CA6 superseded in Sections 4 and 5.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Mitigation measures are discussed throughout Sections 14-33 where relevant and in Appendix D.	Mitigation measures for SH1 and CA6 discussed in sections 4 and 5.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	A description of alternatives considered is covered in Sections 9 and 10.	n/a
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	The proposed indicators to monitor the effects are set out in Section 37.	n/a
j) a non-technical summary of the information provided under the above headings	Within separate document (NTS 2017).	Within separate document (NTS 2018).

## **2. THE SUSTAINABILITY APPRAISAL FRAMEWORK & METHODOLOGY**

### **2.1 Introduction**

Where required, the SA has tested the proposed modifications to the Submission JAAP against a framework of objectives that reflect relevant sustainable development policy objectives. This framework was developed in the Scoping Report in 2012.

### **2.2 Sustainability Appraisal Objectives**

The SA objectives for the appraisal of the JAAP are:

1. Increase energy efficiency; encourage the use of renewable energy sources; increase the uptake of passive design and encourage use of established standards for new and existing development.
2. Encourage the sustainable use of water.
3. Improve land-use efficiency through re-use of previously developed land, buildings and materials.
4. Conserve, protect and enhance biodiversity (flora and fauna) and habitats.
5. Maintain local distinctiveness and protect and enhance the historic environment; including townscapes, buildings and their settings, archaeological heritage, parks and landscapes.
6. Protect, enhance and improve the accessibility of public open space and green infrastructure.
7. Reduce the risk and levels of air and noise pollution.
8. Reduce pollution and the risk of pollution to land.
9. Reduce pollution and the risk of pollution to water.
10. Ensure that all developments have taken into account the changing climate and adaptable and resilient to extreme weather events.
11. Improve health and wellbeing and reduce inequalities in health.
12. Reduce crime, the fear of crime and antisocial behaviour through planning and design processes.
13. Promote sustainable transport and reduce the use of the private car.
14. Reduce poverty, social exclusion and social inequalities and narrow the gap between the most and least deprived areas so that no one is seriously disadvantaged by where they live.
15. Meet the need for housing, including affordable housing and ensure that all groups have access to decent and appropriate housing.
16. Create and sustain vibrant communities which recognise the needs and contributions of all individuals.
17. Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.
18. Avoid, reduce and manage the risk from all sources of flooding to and from the development and to minimise coastal erosion where possible.
19. Improve the range, quality and accessibility of services and facilities and improve the integrated transport links with them.
20. Create places and spaces that work well, wear well and look good.

21. Raise educational and skills levels to enable people to remain in work, and access good quality jobs.
22. Reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, business and initiatives that promote these and similar issues.

### 2.3 Methodology

The SA uses the following methodology to demonstrate impact:

+	Policy positively supports achievement of SA objective
-	Policy has adverse effects on achievement of SA objective
0 or blank	Policy has no impact on the SA objective
-/+	Policy has mixed impacts
?	Impacts uncertain

Account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the appraisal as appropriate.

The appraisal undertaken at this modifications stage is comprises a two stage process which consist of an initial screening stage which considers the type of change and whether it could have an effect on any of the sustainability appraisal objectives, followed by full re-assessment only if the screening stage indicates there likely to be a change in the previous appraisal findings. The screening stage is set out in section 4. Re-assessments can be found in Section 5.

This report also follows the format of the SA 2017 of the Publication JAAP Section 14 and considers any changes resulting from these assessments on the relative SA objectives in the following format:

- Across the Character areas
- Across the harbour area
- The AAP 'as a whole'

This is set out in more detail in Section 5..

### **3. Screening Proposed Modifications**

#### **3.1 Introduction to screening stage**

The aim of the screening stage is to identify modifications which are considered to make a difference to the previous Sustainability Appraisal findings of the JAAP and are therefore considered to be significant enough to require re-appraisal.

#### **3.2 Screening stage outcome**

A total of 95 proposed modifications have been put forward, comprised of 81 minor modifications and 14 main modifications. The full wording of all modifications can be found in Appendix A (minor modifications) and Appendix B (main modifications). The full results of the screening exercise which can be also be found in Appendix A and Appendix B.

The screening process identified three main types of effects:

- no impact on any of the Sustainability Appraisal objectives, e.g. modification is of an editorial nature or for clarification/information purposes.
- a minor positive or negative effect on one or more of the Sustainability Appraisal objectives, e.g. may strengthen a policy, but does not change the previous SA findings.
- a major positive or negative effect on one or more of the Sustainability Appraisal objectives, that results in a change to the previous SA findings and requires re-assessment.

Where a major positive or negative effect has been identified, a full re-appraisal of that policy has taken place.

None of the minor modifications were found to result in the need of re-appraisal. Two of the main modifications were found to result in the need for re-appraisal: MM5 which relates to policy SH1 Climate change, energy and sustainable building; and MM10 which relates to policy CA6 Harbour Mouth. The appraisals can be found in Section 4.

## **4. APPRAISAL OF POLICIES SH1 and CA6**

### **4.1 Introduction**

At this stage, an appraisal of two policies has taken place to ensure the appraisal considers the effects of implementing these policies, as proposed to be amended. This was done by assessing each policy against the sustainability appraisal objectives set out in the methodology and making a qualitative assessment.

### **4.2 Overview of Appraisal of Policies**

The following two policies have been re-appraised following the screening process:

- Policy SH1 Climate change, energy and sustainable building
- Policy CA6 Harbour mouth

None of the other changes to the other policies or sections within the JAAP were found to have significant effects on the SA results.

Section 4.3 and 4.4 shows the results of the re-appraisals. Changes to the appraisals from the SA 2017 are shown in red font with underline. Changes to the policy in bold font indicate the main modification that has resulted in the change to scores.

### 4.3 Appraisal of Policy SH1: Climate Change, Energy and Sustainable Buildings

#### Previous SA recommendation (Publication JAAP 2017)

- None

#### Summary of amendments (between Publication JAAP 2017 and Submission JAAP 2018 stages):

- (MM2) Revision to supporting text to reflect the updated Shoreham Harbour District Energy Feasibility Study 2018 and status of the Shoreham Heat Network project which proposed a 2km network serving allocated sites within the Western Harbour Arm area served by marine source heat pumps and gas CHP technologies, with points for abstraction and discharge of water identified within the harbour mouth.
- (MM2) Revision to supporting text which confirms that all new development in and around the Western Harbour Arm will be required to connect to the heat network when complete or be connection ready.
- (MM3) Change to SH1.4 to refer to the regeneration partnership.
- (MM4) New sentence added to SH1.5 demonstrating support for proposals for renewable and low carbon energy generation.
- **(MM5) New sentence demonstrating support for the district heat network and associated infrastructure, amended text reflecting updated study and change in text with it now a requirement rather than an expectation for development to connect to the heat network or provide for future connection.**

#### Recommendations

- There are no recommendations at this stage. The potential for adverse ecological impacts arising from marine source heat pump infrastructure should be addressed by the need to obtain appropriate environmental permits, referred to paragraph 3.1.1.

#### Summary Appraisal

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	+		-?						+	+			+								
<b>Conclusion</b>																					
+	<p>The policies in this section strongly support the objectives concerned with energy, water, climate change, health and deprivation. The scores for objectives 11 (health and wellbeing) and 14 (deprivation, social exclusion and equality) are positive due to the indirect positive benefits that will arise from the delivery of district heating networks, such as reduced risk of fuel poverty and improved health, particularly if it benefits more deprived communities. <u>The policy now has potential to have an indirect adverse impact on biodiversity, mainly due to the delivery of marine source heat pump infrastructure. This is also considered uncertain and would require further investigation, however it is noted that the supporting text paragraph 3.1.1 refers to the need to obtain environmental permits for this work, which will ensure impacts are addressed.</u></p>																				
<b>Recommendation</b>																					
No further recommendations. <u>Mitigation would be provided by the need to obtain environmental permits, as referred to under paragraph 3.1.1.</u>																					

## Full Appraisal

<b>1</b>	<b>Increase energy efficiency; encourage the use of renewable energy sources; increase the uptake of passive design measures; encourage use of established standards for new and existing development.</b>
<b>+</b>	There are various requirements in the policy that specifically aim to address this objective. This will be achieved through the design of buildings, including the incorporation of passive design measures; as well as through energy efficiency measures that reduce the consumption of energy. The policy requires development to “seek to achieve” zero carbon status ( <u>amended at publication stage</u> ) however the various other policy requirements should ensure this objective is still achieved. The policy requires development to incorporate low and zero-carbon technologies <u>and now also demonstrates support for renewable and low carbon energy generation. The policy now shows strong support for the development of the district heat network and associated infrastructure. The policy refers to the updated Shoreham Harbour Heat Network Study and its findings, and now “requires” rather than “expects” development within a certain area to connect to the network or to provide for future connection, which is considered to be stronger than the previous policy position.</u> Impacts are considered to be positive, direct and significant, span all timescales and be permanent in nature.
<b>2</b>	<b>Encourage the sustainable use of water.</b>
<b>+</b>	There are various requirements in the policy that specifically aim to address this objective. This will be achieved through the design of buildings, including meeting high water efficiency standards, such as achieving 110 l/p/day in residential development and BREEAM excellent for commercial developments, and measures to recycle, harvest and conserve water resources. It also requires all development to connect to onsite recycled water network, where practical. Impacts are considered to be positive, direct and significant, span all timescales and be permanent in nature
<b>3</b>	<b>Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.</b>
	This objective is addressed by other objectives in the JAAP. However this appraisal notes that BREEAM awards additional credits for development on previously developed land and awards credits for re-use of materials.
<b>4</b>	<b>Conserve, protect and enhance biodiversity (flora and fauna) and habitats.</b>
<b>-?</b>	<u>The policy now provides clear support for the infrastructure associated with the district heat network and the supporting text indicates that heat would be sourced by marine source heat pumps as well as gas CHP. Water source heat pumps involve pipework within the water, can alter the temperature of the water and could therefore disrupt the water’s ecosystem having potential for adverse impacts for this objective. This is also considered fairly uncertain and would require further investigation. Implementation could have potential for adverse impact and could be permanent in nature. There are no recommendations for changes to policy in relation to this potential for adverse impacts as it is noted that the supporting text refers to the need to obtain environmental permits for this infrastructure which should ensure that impacts are addressed. Mitigation should also be provided through area-wide policies.</u>
<b>5</b>	<b>Maintain local distinctiveness; protect and enhance the historic environment including townscapes, buildings and their settings, archaeological heritage, parks and landscapes.</b>
	This objective is addressed by other policies in the JAAP.
<b>6</b>	<b>Protect, enhance, and improve the accessibility of public open space and green infrastructure.</b>
	This objective is addressed by other policies in the JAAP.
<b>7</b>	<b>Reduce the risk and levels of air and noise pollution.</b>

	This objective is addressed by other policies in the JAAP.
<b>8</b>	<b>Reduce pollution and the risk of pollution to land.</b>
	This objective is addressed by other policies in the JAAP.
<b>9</b>	<b>Reduce pollution and the risk of pollution to water.</b>
	This objective is addressed by other policies in the JAAP.
<b>10</b>	<b>Ensure that all developments have taken into account the changing climate and are adaptable and resilient to extreme weather events.</b>
<b>+</b>	The policy includes requirements that aim to address this objective. This includes measures that will help reduce water demand as well as measures to recycle and conserve water. Impacts are considered to be positive and direct, will span all timescales and be permanent in nature.
<b>11</b>	<b>Improve health and wellbeing and reduce inequalities in health.</b>
<b>+</b>	The appraisal notes that the policy supports the development of district energy and heat networks. This could reduce heating costs for residents and therefore have a positive impact in relation <u>to reducing the risk of</u> fuel poverty and deprivation. In addition, highly efficient homes will also help to reduce the risk of fuel poverty. This would assist in meeting this objective. Impacts are considered to be positive and indirect, could be significant and are likely to span all timescales. Deliver of energy infrastructure is considered to be permanent in nature.
<b>12</b>	<b>Reduce crime, the fear of crime and antisocial behaviour through planning and design processes.</b>
	This objective is addressed by other policies in the JAAP.
<b>13</b>	<b>Promote sustainable transport and reduce the use of the private car.</b>
	This objective is addressed mainly by other policies in the JAAP.
<b>14</b>	<b>Reduce poverty, social exclusion and social inequalities and narrow the gap between the most and least deprived areas so that no-one is seriously disadvantaged by where they live.</b>
<b>+</b>	Although this objective is addressed by other policies in the JAAP, the appraisal notes that the policy <u>strongly</u> supports the development of district energy and heat networks. This could reduce costs for residents and therefore have a positive impact in relation to fuel poverty and deprivation. This would assist in meeting this objective. Impacts are considered to be positive and indirect, could be significant and are likely to span all timescales. Deliver of energy infrastructure is considered to be permanent in nature.
<b>15</b>	<b>Meet the need for housing, including affordable housing, and ensure that all groups have access to decent and appropriate housing.</b>
	This objective is addressed by other policies in the JAAP.
<b>16</b>	<b>Create and sustain vibrant communities which recognise the needs and contributions of all individuals.</b>
	This objective is addressed by other policies in the JAAP.
<b>17</b>	<b>Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.</b>
	This objective is addressed by other policies in the JAAP.
<b>18</b>	<b>Avoid, reduce and manage the risk from all sources of flooding to and from the development and to minimise coastal erosion where possible.</b>
	This objective is mainly addressed by other policies in the JAAP.

<b>19</b>	<b>Improve the range, quality and accessibility of services and facilities and to improve integrated transport links with them.</b>
	This objective is addressed by other policies in the JAAP.
<b>20</b>	<b>Create places, spaces and buildings that work well, wear well and look good.</b>
	This objective is addressed by other policies in the JAAP.
<b>21</b>	<b>Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.</b>
	This objective is addressed by other policies in the JAAP.
<b>22</b>	<b>Reduce waste generation and increase material efficiency and re-use of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.</b>
	This objective is addressed by other policies in the JAAP.

#### 4.4 Appraisal of Policy CA6: Harbour Mouth

##### Previous SA Recommendation (Publication Stage 2017)

- [No recommendations](#)

##### Summary of amendments (between Publication Stage JAAP 2017 and Submission Stage JAAP 2018):

- [MM8: New “Area Priority” relating to supporting delivery of Shoreham Heat Network](#)
- [MM9: Additional paragraph within Supporting Text regarding proposed network served by marine source heat pumps and gas CHP, with marine source heat pump technology located within the Harbour Mouth Area.](#)
- [MM10: New policy text \(9\) supporting development of infrastructure to deliver the heat network.](#)

##### Summary Appraisal

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+		+	+/-?	+	+					+	+	+/-		+		+		+	+		
<b>Conclusion</b>																					
+	<p>This policy scores positively in relation to most of the sustainability objectives which are of relevance. These include <a href="#">energy efficiency</a>, improvements to historic assets, improved open space and public realm, health, reduced crime, and economic development. There is also some potential for positive impacts on improving land use efficiency and housing delivery due to the potential redevelopment of certain sites within the Character Area. There is potential for mixed impacts in relation to sustainable transport as car park improvements could encourage the use of the private car. <a href="#">There is also potential for mixed impacts in relation to biodiversity, reflecting the positive aspirations of the policy particularly in relation to designated sites, however also reflecting the potential for environmental impacts arising from installation of marine source heat pump technology in this location, although it is noted that this is addressed through need to obtain environmental permits in relation to marine source heat pumps.</a></p>																				
<b>Recommendation</b>																					
<p>No recommended changes. <a href="#">Mitigation would be provided through area-wide policies and through the need to obtain environmental permits in relation to marine source heat pumps.</a></p>																					

##### Full Appraisal

1	Increase energy efficiency; encourage the use of renewable energy sources; increase the uptake of passive design measures; encourage use of established standards for new and existing development.
+	<a href="#">The policy now refers to Shoreham Heat Network and supports development of infrastructure associated with the heat network in this character area. This will comprise marine source heat pump technologies. This is considered to have positive impacts on this objective through provision of heat through renewable sources and the resultant energy that will be conserved.</a>
2	Encourage the sustainable use of water.

	This objective is addressed by other policies in the JAAP.
<b>3</b>	<b>Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.</b>
+	This objective is mainly addressed by other policies in the JAAP. However the policy supports Adur Homes who are considering redeveloping some of its housing sites which could increase land use efficiency and have a positive impact on this objective. In addition, finding an alternative use for the lorry park could increase the land use efficiency of the site. However impacts will be dependent on these coming forward.
<b>4</b>	<b>Conserve, protect and enhance biodiversity (flora and fauna) and habitats.</b>
+/-?	<p>The Harbour Mouth Character Area includes part of the Shoreham Beach LNR and SNCI/LWS. This is an area of vegetated shingle which is an important and rare habitat for a number of species. The policy includes a requirement to protect the LNR/SNCI/LWS as well as promote opportunities for interpretation. In addition, the policy promotes planting along the Albion Street/Brighton Road, which could have benefits for biodiversity.</p> <p><u>The policy now provides clear support for the infrastructure associated with marine source heat pumps to be located within this area. Water source heat pumps involve pipework within the water, can alter the temperature of the water and could therefore disrupt the water's ecosystem having potential for adverse impacts for this objective However it is noted that this should be addressed through the need to obtain environmental permits, as referred to under paragraph 3.1.1.</u></p> <p>Overall the impacts are considered to be <u>mixed, with some uncertainty relating to the adverse impact.</u> Impacts will span all timescales.</p>
<b>5</b>	<b>Maintain local distinctiveness; protect and enhance the historic environment including townscapes, buildings and their settings, archaeological heritage, parks and landscapes.</b>
+	The Harbour Mouth includes the Grade II listed Kingston Buci Lighthouse and Shoreham Fort; a Scheduled Monument. The policy proposes improvements to the Kingston Beach area. The policy no longer proposes the restoration of Shoreham Fort and now proposes the conservation of the Fort. It is understood that this is because of financial viability. This is not considered to have a significant impact on the SA score, although will have an impact on the Fort itself. The policy also includes improved public realm, parking and access for both areas are also included. Impacts are considered to be positive, direct and significant, will span all timescales and be permanent in nature.
<b>6</b>	<b>Protect, enhance, and improve the accessibility of public open space and green infrastructure.</b>
+	The Harbour Mouth area includes the open spaces of Kingston Beach Village Green, Shoreham Fort and the easternmost part of Shoreham Beach. The policy includes protection and improvements to these areas which will have positive impacts. The policy also includes exploring options to ensure the waterfront route is delivered which should increase access. In addition, the policy includes the promotion of planting as part of the green corridor, which will also have positive impacts. Impacts are considered to be positive, direct, will span all timescale and will be permanent in nature.
<b>7</b>	<b>Reduce the risk and levels of air and noise pollution.</b>
	This objective is addressed by other policies in the JAAP.
<b>8</b>	<b>Reduce pollution and the risk of pollution to land.</b>
	This objective is addressed by other policies in the JAAP.
<b>9</b>	<b>Reduce pollution and the risk of pollution to water.</b>
	This objective is addressed by other policies in the JAAP.

10	<b>Ensure that all developments have taken into account the changing climate and are adaptable and resilient to extreme weather events.</b>
	This objective is addressed by other policies in the JAAP.
11	<b>Improve health and wellbeing and reduce inequalities in health.</b>
+	Improvements to Kingston Beach and improved connections with other areas are likely to encourage greater use of this open space and may encourage greater use of the route for walking and cycling. These are likely to have positive impacts. <a href="#">Delivery of a heat network also positively affects health as can protect against the risk of future fuel poverty.</a> Impacts are considered to be indirect and will span all timescales.
12	<b>Reduce crime, the fear of crime and antisocial behaviour through planning and design processes.</b>
+	Improvements to the Kingston Beach and Shoreham Fort areas are likely to encourage greater footfall through the area. This would increase the opportunities for natural surveillance. This is likely to have a positive impact. Impacts are considered to be indirect and will span all timescales
13	<b>Promote sustainable transport and reduce the use of the private car.</b>
+ / -	There are likely to be mixed impacts in relation to this objective. Whilst the policy promotes improved way-finding connections to the footbridge, it also supports improved car parking facilities at both Kingston Beach and Shoreham Fort. This might encourage increased car usage to visit these sites.
14	<b>Reduce poverty, social exclusion and social inequalities and narrow the gap between the most and least deprived areas so that no-one is seriously disadvantaged by where they live.</b>
	This objective is addressed by other policies in the JAAP.
15	<b>Meet the need for housing, including affordable housing, and ensure that all groups have access to decent and appropriate housing.</b>
+	This objective is mainly addressed by other policies in the JAAP. However it is recognised that the policy supports Adur Homes to maximise the use of its sites including redevelopment. This could increase housing provision in the area and have positive impacts.
16	<b>Create and sustain vibrant communities which recognise the needs and contributions of all individuals.</b>
	This objective is addressed by other policies in the JAAP.
17	<b>Promote sustainable economic development with supporting infrastructure, and ensure high and stable levels of employment and a diverse economy.</b>
+	The policy safeguards existing port uses which will support this objective. In addition, the policy supports the potential for a new café/visitor centre around the Shoreham Fort, which could have economic benefits. Impacts are considered to be positive, direct, span all timescales and be permanent in nature.
18	<b>Avoid, reduce and manage the risk from all sources of flooding to and from the development and to minimise coastal erosion where possible.</b>
	This objective is addressed by other policies in the JAAP.
19	<b>Improve the range, quality and accessibility of services and facilities and to improve integrated transport links with them.</b>
+	The policy includes improvements to car parking around Shoreham Fort which could improve access.
20	<b>Create places, spaces and buildings that work well, wear well and look good.</b>

+	Improvements to the Kingston Beach and Shoreham Fort areas are likely to have a positive impact. In addition, street planting and green infrastructure will also have a positive impact. Impacts are considered to be direct and will span all timescales.
21	<b>Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.</b>
	This objective is addressed by other policies in the JAAP.
22	<b>Reduce waste generation and increase material efficiency and re-use of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.</b>
	This objective is addressed by other policies in the JAAP.

## 5. APPRAISAL OF THE PLAN

### 5.1 Introduction

At this Addendum stage a re-appraisal of the effects of implementing JAAP policies SH1 and CA6 has taken place, as described in the previous section. However, the effects of implementing the amended policies in combination with the other policies of the JAAP has also been considered to ensure the cumulative effects of the entire Plan are understood.

As this Addendum only focuses on the key changes resulting from the main modifications, this section only considers the impacts against SA objective 1 “increase energy efficiency...” and SA objective 4 “Conserve, protect and enhance biodiversity...” as these are the only objectives for which any of the scores have changed.

Therefore, impacts of the Plan against other SA objectives can be found in the SA 2017.

### 5.2 Energy Efficiency

SA Objective	Appraisal criteria <i>Will the policy approach under consideration...</i>
1: Increase energy efficiency; encourage the use of renewable energy sources; increase the uptake of passive design and encourage use of established standards for new and existing development.	<ul style="list-style-type: none"> <li>• Will the plan promote low/zero carbon development?</li> <li>• Will the plan encourage changes to increase energy efficiency of new and existing buildings?</li> <li>• Will the plan encourage the use of renewable energy sources?</li> <li>• Will the plan encourage passive design for new and existing development?</li> <li>• Will the plan encourage use of established standards?</li> </ul>

Table to show impacts on this objective across JAAP policies

	SH1	SH2	SH3	SH4	SH5	SH6	SH7	SH8	SH9	CA1	CA2	CA3	CA4	CA5	CA6	CA7	SH10
1	+	+	+/-	+/-						+	+/-	+/-		+/-	+	+/-	

#### Character Areas

South Quayside is promoted as a renewable energy hub, and includes a commitment to pursue a district heat network. The Harbour Mouth is the likely location for infrastructure that supports the Shoreham Heat Network.

Although impacts for other Character Areas for this objective are broadly mixed, which reflects the amounts of development to be brought forward, the policies for character areas present an opportunity to improve the energy efficiency of buildings, to incorporate renewable energy

infrastructure, incorporate passive design measures in new residential and employment areas and strongly supports delivery of the heat network particularly in the Western Harbour Arm.

### Across the Harbour

Policy SH1 Climate Change, Energy and Sustainable Buildings specifically aims to address energy efficiency through zero carbon decentralised energy opportunities and the design of buildings that include the incorporation of passive design measures and low and zero-carbon technologies; as well as through energy efficiency measures that reduce the consumption of energy, and through the requirement that development is ready to connect to any future district heat network or connects where a district heating network exists. The policy also sets BREEAM standards for non-residential development to be achieved as a minimum.

Policy SH2 Shoreham Port encourages proposals for uses that support the Port’s ‘Eco-Port’ status and in becoming a hub for renewable energy generation. It also supports the upgrade and refurbishment of sites to become more resource efficient.

### The AAP ‘as a whole’

The appraisal notes the amount of residential and employment based development proposed to be delivered across the plan area has potential for an increase in energy consumption locally. However, the plan is considered to contain policies that will help to ensure improvements in energy efficiency in the area, and encourages the use of established standards for new and existing development. The plan also strongly encourages the use of renewable energy sources, committing to the establishment of a decentralised energy and heat network, having wider health benefits.

Overall, it is likely that the plan will result in **significant positive effects** for energy efficiency in Shoreham Harbour in the long-term, however the appraisal notes that there is a risk that energy consumption across the area will increase as a result of development. The potential for adverse impacts are considered to be mitigated through the implementation of policies in the JAAP.

## 5.3 Biodiversity

SA Objective	Appraisal criteria <i>Will the policy approach under consideration...</i>
4: Conserve, protect and enhance biodiversity (flora and fauna) and habitats.	<ul style="list-style-type: none"> <li>Will the plan achieve a net gain in biodiversity?</li> <li>Will the plan protect biodiversity and habitats?</li> <li>Will the plan maintain and enhance existing biodiversity and habitats?</li> <li>Will the plan allow the adaptation of biodiversity to a changing climate?</li> <li>Will the plan contribute to any of the Biodiversity Opportunity Areas?</li> </ul>

Table to show impacts across JAAP policies

	SH1	SH2	SH3	SH4	SH5	SH6	SH7	SH8	SH9	CA1	CA2	CA3	CA4	CA5	CA6	CA7	SH10
4	-?			+/-		+	+	+			+	+	+	+	+/-?	+/-	

## **Character Areas**

The Character Area policies generally present an opportunity to increase biodiversity, through requirements relating to green infrastructure with Policy CA2 – Aldrington Basin, Policy CA3 – South Portslade and North Quayside, Policy CA5 – Fishersgate and Southwick, and Policy CA7 – Western Harbour Arm which all require ecological and landscape improvements forming part of the green corridor.

Policy CA4 - Portslade & Southwick Beaches - supports the remediation and improved interpretation of the Basin Road South SNCI (LWS), and safeguards the site from future disturbance. The beach areas and adjacent public spaces will be safeguarded for the protection of coastal processes, marine habitats and the enjoyment of local communities and visitors.

Some of the character area policies could have mixed impacts on biodiversity. Policy CA6 - Harbour Mouth – includes the requirement to protect the Shoreham Beach Local Nature Reserve and promotes opportunities to interpret the marine environment. However, this policy now also supports infrastructure to support the Heat Network, including marine source heat pumps, which could impact upon marine ecosystems. Policy CA7 - Western Harbour Arm – requires the incorporation of SuDS features such as suitable trees and vegetation into the waterfront route. This, and new areas of public open space have the potential to enhance the biodiversity of the area. Policy CA7 also requires development to incorporate enhancements to the riverine environment to promote biodiversity, with the provision of compensatory habitat, particularly intertidal habitat, to mitigate any loss or degradation of habitats that may occur due to the land-raising required as part of flood defence work. However impacts for this policy are considered to be mixed due to the ecological constraints of the area and the potential for land-raising in this area.

### **Across the Harbour**

Some of the impacts from the area-wide policies are generally supportive towards meeting this objective, however also present some risks to biodiversity.

Policy SH1 – Climate change, energy and sustainable building is supportive of provision of a heat network which would be powered by marine source heat pumps to be located within the Harbour Mouth. This could have adverse impacts upon marine ecology. Policy SH4 – Housing and community could result in an increase in recreational pressure on locally and nationally designated sites, although development provides opportunities to enhance biodiversity through contributions and other measures.

Impacts from other area-wide policies are positive. Policy SH6 – Flood Risk and Sustainable Drainage – includes requirements for appropriate planting, such as green roofs, as well as requirements that should minimise adverse ecological impacts resulting from piling. Policy SH7 – Natural Environment, Biodiversity and Green Infrastructure – sets provision for all development to support the objectives of the Biosphere, to conserve the area's environmental assets and to seek a net gain in biodiversity by creating new habitats. It seeks to deliver an improved green infrastructure network which includes a green corridor, creation

of new areas of vegetated shingle, intertidal habitat creation and green roofs and walls. In particular, development must seek a net increase of habitats of principal importance, particularly those that may be disturbed indirectly through increased recreational activity in the area. Measures to mitigate against such disturbances and enhance biodiversity include landscaping of locally native species, SuDS, and creating, restoring or enhancing off-site habitats.

Policy SH8 – Recreation and Leisure – sets provision of open space, green infrastructure and links to green corridors which would support this objective.

### **The AAP ‘as a whole’**

The Aldrington Basin character area is adjacent to the Basin Road South SNCI (LWS), a site of vegetated shingle that supports sensitive habitats and species, which may be sensitive to increased residential disturbance resulting from new residential development in the area. The Western Harbour Arm character area is adjacent to the Adur Estuary SSSI, which could also be sensitive to increased recreational pressure and policy includes land-raising to form flood defences which could disturb or result in loss of intertidal habitat. The Harbour Mouth Character Area supports delivery of marine source heat pump infrastructure in this location which could impact upon marine ecology, although this would be addressed through the need to obtain environmental permits. However, measures outlined in Policies CA2, CA4, CA6, CA7 and SH6, SH7 and SH8 have the potential to safeguard, maintain and enhance biodiversity and habitats in line with increased development and recreational activity in the harbour and are considered to mitigate adverse effects. Overall, with mitigation, the plan is considered therefore to have the potential to have **positive** effects on biodiversity.

## **6. Cumulative impacts and Inter-relationship between effects**

### **6.1 Cumulative Effects**

The previous sections help to describe the cumulative effects of the Character Areas, the area-wide policies and the JAAP as a whole against the various Sustainability Objectives.

Overall, although some of the appraisals have changed, the cumulative impacts arising from the implementation of the submission JAAP (with proposed modifications) are not considered to be significantly different to those identified at Publication stage. In addition, adequate provision for mitigation where required is considered to be in place.

The following table helps to show the cumulative effects. The final row helps to show the overall impacts of the JAAP against each of the 22 Sustainability Appraisal objectives (pre-mitigation). The final column helps to show the overall impacts of each individual policy.

Table to show Cumulative Impacts

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	All	
SH1	+	+		-?						+	+			+										+
SH2	+		+							+		+					+							+
SH3	+/-	+/-	+				+/-	+	+/-		+/-		+/-	+		+	+	+/-	+	+	+			+/-
SH4	+/-	+/-	+	+/-			+/-	+	+/-		+/-		+/-	+	+	+	+/-	+/-	+					+/-
SH5			+			+	+				+		+				+		+					+
SH6				+		+		+	+	+	+					+		+		+				+
SH7				+		+	+	+	+	+	+							+	+	+		+		+
SH8				+	+	+	+			+	+					+	+	+	+	+				+
SH9					+						+	+			+	+					+			+
CA1	+		+			+	+/-	+/-	+/-				+/-				+	+	+	+				+/-
CA2	+/-	+/-	+	+	+	+	+/-	+	+/-	+/-	+/-	+	+/-	+	+	+	+	+	+/-	+	+		+/-	+/-
CA3	+/-	+/-	+	+	+	+	+/-	+	+/-	+/-	+/-	+	+/-	+	+	+	+	+	+	+		+/-		+/-
CA4				+	+	+					+	+	+							+	+			+
CA5	+/-	+/-	+	+	+	+	+/-	+	+/-	+/-	+	+	+/-	+		+	+	+	+/-	+	+		+/-	+/-
CA6	+		+	+/-?	+	+					+	+	+/-		+		+		+	+				+
CA7	+/-	+/-	+	+/-	+	+	+/-	+	+/-	+/-	+/-	+	+/-	+	+	+	+/-	+/-	+	+	+	+	+/-	+/-
SH10					+	+					+	+	+	+		+		+	+	+	+			+
Overall	+/-	+/-	+	+	+	+	+/-	+	+/-	+/-	+	+	+/-	+	+	+	+	+	+	+	+	+	+/-	

## 6.2 Interrelationship between effects

The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the JAAP. This has been done as an integral part of the appraisal of the policies. The main interrelationships found through the appraisal are highlighted below.

### Potential Positive Impacts

- Incorporation of low and zero carbon energy infrastructure including infrastructure to connect to future networks, helping to minimise carbon emissions, helping to reduce the risk of fuel poverty, supporting health and reducing deprivation.
- Measures to conserve water resources support improvements to water quality.
- Remediation of contaminated land and improvements in tidal flood defences and delivery of SUDS, minimise the risk of tidal flooding, surface water flood risk and water pollution.
- Improved green infrastructure network including creation of green corridor and improvements to areas of vegetated shingle and intertidal habitats resulting in net gains in biodiversity
- Improved access to the waterfront, improved connectivity throughout and to the JAAP area and improved access to existing open space and delivery of new open space increase opportunities for active lifestyles
- Improvements to the road network, and measures to promote sustainable travel reduce the need to travel by car having health and air quality benefits.
- Delivery of different types of housing including affordable housing
- Safeguarding of port-operational activity and some existing employment floorspace, and delivery of new employment floorspace of a range of types supports economic growth.
- Creation of training and employment opportunities, including those for local residents also supports economic growth and reduces deprivation
- Improved land use efficiency
- Improved and increased access to a range of services and facilities
- Improved public realm, and well-designed developments help to improve streetscapes and enhance the historic built environment where relevant

### Potential Adverse Impacts

- Amounts of development have potential for an overall increase in energy consumption resulting from increased population
- Amounts of development have potential for an overall increase water consumption resulting from increased population
- Potential risk of flooding in certain locations
- Potential for pollution of water resulting from disturbance of contaminants

- Potential for loss of intertidal habitats in certain locations from landraising and potential for impacts on marine ecosystems relating to water source heat pump infrastructure
- Potential increased transport movements resulting from increased population, resulting in potential worsening of air quality
- Potential for noise issues resulting from increased transport and incompatibility of neighbouring uses
- Potential for an overall increase in waste generation resulting from increased population

### **6.3 Likely Evolution Without Implementation Of The Plan**

The no plan scenario is considered to result in the following:

- limited piecemeal development that does not contribute towards a comprehensive regeneration scheme
- lower levels of housing and employment coming forward
- limited opportunities to increase land use efficiency
- lack of sustainable transport infrastructure
- Shoreham heat network not delivered
- no improvements to flood defences
- no improvements to existing community resources
- no coordinated approach to green infrastructure
- worsening of air quality, noise issues and congestion
- no improvement to streetscape, public realm and general appearance of the area

## **7. MONITORING**

The proposed monitoring indicators put forward for monitoring in the SA August 2017 are still considered to be applicable.

## **8. NEXT STEPS**

It is proposed that the JAAP, SA, including this SA Addendum and all other relevant documentation will be submitted to the Planning Inspectorate in May 2018. Following this the JAAP will be examined by the Planning Inspectorate. Following this the modifications to the JAAP, as assessed in this SA Addendum will be consulted upon.

## **Appendix A SA Screening of minor modifications**

The schedule below sets out changes proposed to the Submission Shoreham Harbour Joint Area Action Plan, submitted under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and outlines the results of the SA screening.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN1	1.3	Who <del>has</del> prepared the plan?	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN2	1.3.1	The plan <del>was has been</del> prepared by the Shoreham Harbour Regeneration Partnership. This is made up of Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN3	1.3.2	The partnership also works closely with a number of other organisations. These include the Environment Agency, <del>Homes England the Homes and Communities Agency</del> , Highways England, Natural England and Historic England.	The Homes and Communities Agency became Homes England on 11 January 2018.	Not within policy. Typographical correction. No SA implications.
MIN4	1.3.3	The plan <del>has been will be</del> jointly adopted by Adur District Council, Brighton & Hove City Council and West Sussex County Council.	Change of tense once adopted. To correct missing punctuation.	Not within policy. Typographical correction. No SA implications.
MIN5	1.4	Why <del>was has</del> the plan <del>been</del> prepared?	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN6	1.4.3	The JAAP will help to generate investment and access funding for improved infrastructure, including sustainable transport, flood defences and sustainable drainage. It <del>will</del> <u>support</u> s the safeguarding of the important function of Shoreham Port, including the importing and handling of aggregates and minerals.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN7	1.4.4	The plan promotes the port as a hub for renewable energy generation, contributing to national and local carbon reduction targets. The JAAP <del>will</del> <u>also promotes</u> the creation and enhancement of green infrastructure links through the area.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN8	1.5	How <del>was</del> <u>has</u> the plan <del>been</del> prepared?	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN9	1.5.1	There <del>were</del> <u>are</u> four stages to preparing the JAAP. <del>The process is at currently at stage 4:</del>	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN10	1.5.1 bullet 4	<b>Stage 4:</b> Publication of the Proposed Submission JAAP, submission to the Secretary of State for independent examination, followed by formal adoption by the councils (2017 – <del>2019</del> <u>2018</u> ).	To reflect expected adoption date.	Not within policy. Typographical correction. No SA implications.
MIN11	1.7.1	The JAAP is a local plan for the Shoreham Harbour Regeneration Area. The JAAP <del>is</del> <u>will be</u> part of the development plan for both Adur and Brighton & Hove. The Adur Local Plan and Brighton & Hove City Plan Part One designate the regeneration area as a broad location for change.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN12	1.7.4	1.7.4 <del>Once adopted, the</del> <u>The</u> JAAP supersedes the following policy documents: <ul style="list-style-type: none"> <li>• <i>South Portslade Industrial Estate and Aldrington Basin Development Brief</i> (2013)</li> <li>• <i>Western Harbour Arm Development Brief</i> (2013)</li> <li>• <i>Shoreham Harbour Interim Planning Guidance</i> (2011)</li> </ul>	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
MIN13	1.7.5	<del>This version of the plan has been prepared and published in accordance with Regulation 19 of the Town and County Planning (Local Planning) Regulations 2012 for public consultation purposes. The plan sets out the vision and strategic objectives, the policies, and the proposed site allocations. In this plan, the authorities have sought to address the points raised on the Regulation 18 Draft JAAP</del>	Remove text relating to publication stage of plan preparation.	Not within policy. Typographical correction to reflect current stage. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		<del>consultations and points raised in engagement with consultees. The policies in this Proposed Submission plan will be given appropriate weight in the determination of planning applications.</del>		
MIN14	1.8.1 <u>new footnote</u>	<u>The UK is expected to leave the EU in March 2019. The European Union (Withdrawal Bill) will convert existing EU law (such as EU regulations and EU decisions) directly in the UK's legal Systems. The Bill will preserve laws made in the UK to implement EU obligations (e.g. the laws which implement EU directives).</u>	To reflect status of EU law once the UK leaves the EU.	Not within policy. Information only. No SA implications.
MIN15	1.8.7	<u>The proposals in this plan have also been screened for HRA. The Shoreham Harbour Joint Area Action Plan Habitats Regulations Assessment Screening Report (2018) concludes that a full HRA is not required as there are no significant impacts on protected European sites.</u> <del>As the proposals in this plan are in line with the local plans, the partnership and Natural England have agreed that an HRA is not needed for the JAAP. The Shoreham Harbour Habitats Regulations Statement (2016) sets this out in full.</del>	To reflect updated HRA report.	Not within policy. Information only. No SA implications.
MIN16	1.9.1 footnote 8	<u>National Planning Policy Framework (DCLG: 2012). At the time of submission, the Ministry of Housing, Communities &amp; Local Government was consulting on an updated NPPF.</u>	To clarify that an updated version of the NPPF has been published for consultation.	Not within policy. Information only. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN17	1.10.10 bullet 5	<ul style="list-style-type: none"> <li>• policies in the <del>emerging</del> Adur Local Plan and Joint Area Action Plan that recognise the need to enhance green corridors and improve ecological connectivity.</li> </ul>	To reflect adoption of Adur Local Plan.	Not within policy. Typographical correction. No SA implications.
MIN18	1.10.12	Marine plans and local plans overlap between high and low water marks. The South Inshore Marine Plan includes the coastline at Shoreham Beach, and Southwick and Portslade-by-Sea. It also includes the Eastern and Western Arms of the River Adur.	To correct typographic error.	Not within policy. Typographical correction. No SA implications.
MIN19	1.11.3	<p>Adur District Council <del>adopted will adopt</del> the Adur Local Plan in December 2017. The plan provides a strategy for development in Adur up to 2032. Policy 2 (Spatial Strategy) states:</p> <p><u><i>“Shoreham Harbour will be a focus for development to facilitate regeneration through delivery of a mix of uses including housing which will be delivered through an Area Action Plan being prepared jointly between Adur District Council, Brighton &amp; Hove City Council and West Sussex County Council.”</i></u></p> <p><del><i>Shoreham Harbour will be the focus of a significant level of development to facilitate regeneration of the Harbour and neighbouring communities, which will be delivered through an Area Action Plan to be prepared jointly between Adur District Council, Brighton &amp; Hove City Council and West Sussex County Council.</i></del></p>	To reflect adoption of Adur Local Plan, and update direct quotation from Adur Local Plan.	Not within policy. Typographical correction. No SA implications.
MIN20	1.11.4	<p>Policy 8 (Shoreham Harbour <u>Regeneration Area</u>) sets out the policy and priorities for each character area and states that:</p> <p><u><i>“The Council will facilitate the delivery of a minimum of 1,100 new dwellings and a minimum of 16,000sqm</i></u></p>	To update direct quotation from Adur Local Plan.	Not within policy. Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		<i><u>of employment generating uses (including B1 uses) within that part of the Shoreham Harbour Regeneration Area Western Harbour Arm during the plan period to 2032 (as shown on the Policies Map)."</u></i> <del><i>"The Council will facilitate the delivery of a minimum of 1,100 new dwellings within the Shoreham Harbour Regeneration Area within Adur District during the plan period to 2032."</i></del>		
MIN21	1.11.10	The West Sussex Minerals Local Plan (2003) safeguards a number of wharves at Shoreham Harbour, including some sites proposed for new mixed use development in this plan. The <u>Proposed Submission</u> <del>Submission Draft</del> West Sussex Joint Minerals Plan (2017) seeks to safeguard sufficient capacity to ensure a steady and adequate supply of minerals whilst supporting regeneration aspirations set out in this document. The Plan has been submitted to government for examination on legal compliance and soundness.	To reflect the current stage of the West Sussex Joint Minerals Plan.	Not within policy. Typographical correction. No SA implications.
MIN22	1.12.4	<u>Shoreham Port Authority produced the Shoreham Port Masterplan (2010) and Shoreham Port Masterplan Review (2017).</u> <del>Shoreham Port Masterplan (2016).</del> Although it is not a statutory planning policy document, the plan sets the port's future development and must be taken into account when considering new developments in or near the port.	To clarify that the original masterplan was reviewed in 2017.	Not within policy. Typographical correction. No SA implications.

<b>Minor Modification No:</b>	<b>Reference:</b> (Paragraph, policy or map number)	<b>Amendment:</b> (Amendments are <b>shown in red text</b> . Deleted text <b>shown as struck through</b> and additional text <b>shown as underlined</b> )	<b>Reason(s) for amendment</b> (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	<b>Sustainability Appraisal Screening</b>
MIN23	Objective 1 – 1 <sup>st</sup> paragraph	To minimise carbon emissions, address the challenges of climate change and create a renewable energy hub.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN24	Objective 2	To support a growing, thriving port. To facilitate the delivery of the adopted Port Masterplan, the provision of a modernised, consolidated and sustainable port, and to promote the important role of the Port in the local and wider economy.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN25	Objective 3 – 2 <sup>nd</sup> paragraph	To provide new, high quality employment floorspace and improve the business environment to support the needs of local employers. To equip local communities with the training and skills required to access existing and future employment opportunities.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN26	Objective 4 – 1 <sup>st</sup> paragraph	To provide new homes and contribute to meeting identified housing need.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN27	Objective 5 – 1 <sup>st</sup> paragraph	To improve connections and promote sustainable transport choices.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN28	Objective 6 – 1 <sup>st</sup> paragraph	To reduce the risk of flooding and adapt to climate change.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN29	Objective 7 – 1 <sup>st</sup> paragraph	To add to the natural capital of the Shoreham Harbour Regeneration Area by delivering net gains to biodiversity and a multifunctional green infrastructure network.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN30	2.2.19	Local planning authorities should plan for recreational and leisure facilities and services to meet the needs of <b>existing communities and</b> new development. Planning	Representation JAAP2017-1510b (Shoreham Rowing Club) stated that the JAAP is unsound and proposed the	Not within policy. No SA implications.

<b>Minor Modification No:</b>	<b>Reference:</b> (Paragraph, policy or map number)	<b>Amendment:</b> (Amendments are <b>shown in red text</b> . Deleted text <b><del>shown as struck through</del></b> and additional text <b><u>shown as underlined</u></b> )	<b>Reason(s) for amendment</b> (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	<b>Sustainability Appraisal Screening</b>
		plays an important role in promoting healthy and active lifestyles. This includes the provision of open space, sports and recreation facilities.	following modification: Local planning authorities should plan for recreational and leisure facilities and services to meet the needs of new development <b><u>and those of the existing community by further enhancing existing leisure facilities and services.</u></b> The Councils do not accept that the plan is unsound. However, the proposed amendment makes clear that the needs of existing communities should also be considered.	
MIN31	Objective 9 – 1 <sup>st</sup> paragraph	To promote high design quality and improve townscape.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
MIN32	2.3.10	Access to Portslade and Southwick Beaches for pedestrians and cyclists will be improved. Habitats and biodiversity will be created and protected.	To correct typographic error.	Not within policy. Typographical correction. No SA implications.
MIN33	Map 3	<b>Amendment to boundary of site at Aldrington Basin allocated for Employment (proposed/protected)</b>	To address an issue raised by DMH Stallard on behalf of Hopegar Properties Ltd ( <b>Representation: 2017-1202</b> ). This corrects a drafting error in preparing the maps for the Proposed Submission plan.	Not within policy. Factual correction. No SA implications.
MIN34	Map 4	<b>Amendment to boundary of site at Aldrington Basin allocated for Employment (proposed/protected)</b>	To address an issue raised by DMH Stallard on behalf of Hopegar Properties Ltd ( <b>Representation: 2017-1202</b> ). This corrects a drafting error in preparing the maps for the Proposed Submission plan.	Not within policy. Typographical correction. No SA implications.
MIN35	Map 5	<b>Amendment to show The Ham as village green</b>	To show correct designation of The Ham.	Factual correction to reflect designation. No SA implications.

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MIN36	2.4.7	There are <u>Local Wildlife Sites Sites of Nature Conservation Importance (LWSSNCIs)</u> at Shoreham Beach and Basin Road South. Shoreham Beach is also a Local Nature Reserve.	To reflect the change in terminology for this designation from SNCI to LWS.	Not within policy. Terminology change only. No SA implications.
MIN37	2.4.8	Kingston Beach <u>and The Ham are registered as is a village greens</u> . This safeguards <u>these areas</u> <del>the beach</del> as <u>a public spaces</u> .	To show correct designation of The Ham.	Not within policy. Factual correction to reflect designation. No SA implications.
MIN38	2.4.9 2 <sup>nd</sup> bullet	<ul style="list-style-type: none"> <li><del>The Ham, a small recreation ground and skate park in the Western Harbour Arm area</del></li> </ul>	To reflect the inclusion of The Ham in paragraph 2.4.8.	As above.
MIN39	3.1 Objective 1 – 1 <sup>st</sup> paragraph	To minimise carbon emissions, address the challenges of climate change and create a renewable energy hub.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN40	3.1.13 – 3.1.14	<u>Amend subheading between paragraphs: Heat networks Potential for district heat network</u>	To reflect current status of Shoreham Heat Network project.	No SA implications.
MIN41	3.1.19	Development should demonstrate that the heating and cooling systems have been selected in accordance with the following heating and cooling hierarchy: <u>Change bullets to numbered list</u>	To correct missing punctuation. To clarify that the points are a hierarchy rather than a list of options.	Formatting change. No SA implications.
MIN42	3.1.20 – 3.1.21	<u>Add subheading between paragraphs: Wind energy</u>	To reflect content of following paragraphs.	No SA implications
MIN43	3.2 Objective 2	To support a growing, thriving port. To facilitate the delivery of the adopted Port Masterplan, the provision of a modernised, consolidated and sustainable port, and to promote the important role of the Port in the local and wider economy.	To correct missing punctuation.	Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN44	3.2.4	The current level of use at Shoreham Port is 700 to 900 ship arrivals per year, which results in a trading throughput of approximately 1.8 to 2 million tonnes per year. The main commodities that are imported and exported at the port are aggregates, timber, scrap metal, cereals, oil and increasingly steel. The <u>Shoreham Port Masterplan Review (2017)</u> <del>(2010)</del> aims to provide the capacity for a 25% increase in trade <u>over the masterplan period by 2026</u> .	Factual update to reflect the wording of the <i>Shoreham Port Masterplan Review (2017)</i> .	Factual update. No SA implications.
MIN45	3.2.5	The port is a significant local employer <del>providing around 1,700 jobs</del> . <u>There are now over 100 businesses based on the Port and about 1,600 people working on site</u> . Employers range from large multinationals, national firms, through to a variety of small and medium sized firms including motorbike repairs and cheese suppliers. There are now over 100 businesses based on the Port and about 1,600 people working on site	Factual update to reflect the wording of the Shoreham Port Masterplan Review (2017).	Factual update. No SA implications.
MIN46	3.2.9	Shoreham Port Authority's strategy growth is set out in the updated <u>Shoreham Port Masterplan Review (2017)</u> <del>Shoreham Port Masterplan (2016)</del> and involves consolidating port-related uses within the Eastern Arm, Canal and South Quayside. The JAAP aims to promote the masterplan objective of enhancing the port's role in the local community, particularly in terms of jobs and trade growth.	Factual update to reflect the wording of the Shoreham Port Masterplan Review (2017).	Factual update. No SA implications.

<b>Minor Modification No:</b>	<b>Reference:</b> (Paragraph, policy or map number)	<b>Amendment:</b> (Amendments are <b>shown in red text</b> . Deleted text <b>shown as struck through</b> and additional text <b>shown as underlined</b> )	<b>Reason(s) for amendment</b> (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	<b>Sustainability Appraisal Screening</b>
MIN47	3.3 Objective 3 – 1 <sup>st</sup> paragraph	To stimulate the local economy and provide new jobs.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN48	3.4 Objective 4 – 1 <sup>st</sup> paragraph	To provide new homes and contribute to meeting housing need.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN49	3.4.10	The <i>Adur Local Plan (2017)</i> includes Policy <del>33</del> <u>34</u> : Planning for Sustainable Communities that resists the loss of existing community facilities. Also refer to <u>Policy SH10: Infrastructure Requirements</u> <del>SH17: Planning obligations towards infrastructure delivery</del> in this plan.	To reflect adoption of <i>Adur Local Plan (2017)</i> and to correct errors in reference to policies	Factual and typographical correction. No SA implications.
MIN50	3.5 Objective 5 – 1 <sup>st</sup> paragraph	To improve connections and promote sustainable transport choices.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN51	3.5.14	The <i>Shoreham Harbour Transport Strategy</i> identifies a dedicated, safe and continuous cycle facility along the A259 from Wharf Road to <u>Adur Ferry Bridge</u> <del>Surry Hard</del> , providing a core cycle route, a critical item of infrastructure. Reducing the intimidating nature of the A259 corridor for cyclists with quality surfacing, clear signing, and provision for cycles at side roads or accesses	Since the Shoreham Harbour Transport Strategy was prepared, Adur District Council has entered an agreement with Sussex Yacht Club to purchase a strip of land along the southern edge of Brighton Road (A259). Although this is primarily to provide a new flood defence wall, it will also enable the construction of a shared footway and cycleway between Surry Hard and Adur Ferry Bridge.	Factual update. No SA implications.
MIN52	3.6 Objective 6 – 1 <sup>st</sup> paragraph	To reduce the risk of flooding and adapt to climate change.	To correct missing punctuation.	Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN53	3.6.7	Refer to policies in Part <del>4</del> 3 of this plan which identify the site-specific flood defence and mitigation measures required within the character areas. Development in the Western Harbour Arm in particular will be required to deliver significant flood risk mitigation infrastructure.	To correct referencing error.	Typographical correction. No SA implications.
MIN54	Policy SH6 (9) – (16)	<p>9. Where pontoons and mooring opportunities are provided as part of delivery of new flood defences, the following requirements apply:</p> <p><del>10.</del> Pontoons should be designed to be freestanding structures.</p> <p><del>11.</del> Where boats are to be moored directly onto piling, a structural survey is required to consider whether defences could take the loading over their expected lifetime.</p> <p><del>12.</del> Where loss of habitat occurs due to construction of moorings or pontoons, or from boats resting on intertidal habitat, creation of new <u>like for like</u> compensatory habitat will be required.</p> <p><del>13.</del> <u>10.</u> Proposals should demonstrate how the risks of surface water runoff and water pollution have been reduced including through the introduction of sustainable drainage systems (SuDS) and water capture/recycling technology. SuDS must also be applied to hard landscaping (including paving and road carriageways).</p> <p><del>14.</del> <u>11.</u> New developments must incorporate open space, appropriate planting, green roofs and/or</p>	To correct an error whereby the criteria in clause 9 were formatted as clauses rather than bullet points. Subsequent clauses are renumbered to reflect this amendment. To respond to an issue raised by the Environment Agency (Late Representation 2017-2002).	Typographical & formatting correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		<p>green walls (suitable for coastal growing conditions) to reduce levels of surface water runoff and consequent risk of flooding.</p> <p><del>15. 12</del> Proposals which seek to provide basement parking in tidal/fluvi al flood zones will only be acceptable where adequate mitigation and emergency planning are included as part of the planning application.</p> <p><del>16. 13</del> Proposals must include an emergency strategy to ensure the safety of residents at times of flooding.</p>		
MIN55	3.7 Objective 7 – 1 <sup>st</sup> paragraph	To add to the natural capital of the Shoreham Harbour Regeneration Area by delivering net gains to biodiversity and a multifunctional green infrastructure network.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN56	3.7.8	The eastern end of Shoreham Beach <del>Local Wildlife Site Site of Nature Conservation Importance (LWSSNCI)</del> falls within Character Area 6: Harbour Mouth. A large part of the <del>LWSSNCI</del> is also designated as a Local Nature Reserve (LNR) whose boundary is adjacent to the regeneration area. The site’s main interest is coastal vegetated shingle, an internationally rare and threatened habitat. It also provides a high tide roosting area for wading birds that have fed on the mudflats within the Adur Estuary.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
MIN57	3.7.9	Basin Road South <del>LWSSNCI</del> is located at the eastern end of the regeneration area, adjacent to Allocation Aldrington Basin. This site is also designated for coastal vegetated shingle. The Shoreham Harbour Vegetated Shingle Assessment (2015) found that the	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		site is predominantly made up of imported material and has undergone periods of disturbance.		
MIN58	3.7.10	The Basin Road South <del>LWSSNCI</del> is 1.1ha in size. The assessment found the extent of vegetated shingle to be 0.43ha (39%) concentrated along the northern and southern fringes. The status of this site will be reviewed through the Brighton & Hove City Plan Part Two. The partnership is working to identify opportunities for coastal vegetated shingle habitat creation at Portslade and Southwick Beaches.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
MIN59	3.7.34	<del>The East Sussex, South Downs, and Brighton &amp; Hove Waste and Minerals Plan (2013). Brighton &amp; Hove City Council, East Sussex County Council and the South Downs National Park Authority, have adopted a Waste and Minerals Plan (2013) that</del> The East Sussex, South Downs, and Brighton & Hove Waste and Minerals Plan (2013) provides planning policies to guide the management of waste and production of minerals over the plan period to 2026. In addition, the <i>East Sussex, South Downs and Brighton &amp; Hove Waste and Minerals Sites Plan (2017)</i> identifies areas of safeguarding for current and future waste management capacity. This includes areas at Shoreham Port.	To correct references to adopted plans.	Factual correction. No SA implications.
MIN60	3.7.35	West Sussex County Council and the South Downs National Park Authority have adopted <del>the a West Sussex Waste Local Plan</del> (2014). The Waste Local Plan covers the period to <del>2031 2032</del> and provides a basis for making consistent land-use decisions for waste management facilities.	To correct factual error.	Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are <b>shown in red text</b> . Deleted text <b>shown as struck through</b> and additional text <b>shown as underlined</b> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN61	Policy SH7 (4)	All development <b>applications</b> must <b>be accompanied up to date ecological information to</b> ensure no net loss and seek to provide a net gain to biodiversity, in particular to Habitats of Principal Importance (formerly known as BAP habitats). The indirect impacts of development, such as recreational disturbance, on designated nature conservation sites and other significant habitats must be considered. Appropriate mitigation must be identified, along with the means for its delivery and maintenance.	To address an issue raised by Sussex Wildlife Trust (Representation: JAAP2017-1007). The consultee does not suggest that the plan is unsound. However, the proposed amendment clarifies the requirement for ecological information.	Further strengthens the SA assessment against SA objective 4: "Conserve, protect and enhance biodiversity (flora and fauna) and habitats". However does not change the SA score which is already positive.
MIN62	3.8.17 – 3.8.18	3.8.17 The <i>Adur District Open Spaces Study (2014)</i> <b>was updated in 2014 which has provided sets</b> open space provision standards for the district. 3.8.18 For Brighton & Hove, open space standards are set out within the <i>Open Space Update Study (2011)</i> .	To correct formatting so it is consistent with other documents referenced in the plan.	Formatting correction. No SA implications.
MIN63	3.9 Objective 9 – 1 <sup>st</sup> paragraph	To promote high design quality and improve townscape. <b>.</b>	To correct missing punctuation.	Typographical correction. No SA implications.
MIN64	SH9 (4)	Where appropriate, contribution will be sought for the provision of public art, in accordance with the scale of development proposed.	To correct missing punctuation.	Typographical correction. No SA implications.

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MIN65	Map 7	<b>Amendment to boundary of site at Aldrington Basin allocated for Employment (proposed/protected)</b>	To address an issue raised by DMH Stallard on behalf of Hopegar Properties Ltd ( <b>Representation: JAAP2017-1202</b> ). This corrects a drafting error in preparing the maps for the Proposed Submission plan.	Typographical correction. No SA implications.
MIN66	4.4 Area priorities	<ul style="list-style-type: none"> <li>To seek improvements to the quality, access, appearance and maintenance of the public right of way, beach promenade, public areas and beach environment.</li> <li>To support the delivery of the England Coast Path along the beaches.</li> <li>To protect and enhance important habitats and species, such as coastal vegetated shingle as part of a green corridor along the beaches.</li> </ul>	To correct missing punctuation.	Typographical correction. No SA implications.
MIN67	4.4.4	At the eastern end of Portslade beach is Basin Road South <b>LWSSNCI</b> ; designated for coastal vegetated shingle. This site is part of the operational port and remains in active use. Vegetated shingle covers less than half of the site and is not considered to be an outstanding example of its type. However it is the largest example of this habitat within Brighton & Hove.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
MIN68	Policy CA4 (2)	The partnership will promote <b>and deliver</b> the enhancement and creation of vegetated shingle habitats to create a continuous corridor along the beaches. Compensatory habitat creation and safeguarding will be required for any loss or disturbance to existing habitats.	To address an issue raised by Sussex Wildlife Trust (Representation: JAAP2017-1011). The consultee does not suggest the plan is unsound. However, the proposed amendment clarifies the partnership's commitment to delivering enhancements to coastal vegetated shingle habitats.	Further strengthens the SA assessment against SA objective 4: "Conserve, protect and enhance biodiversity (flora and fauna) and habitats". However does not change the SA score.
MIN69	4.5.17	Surface water flooding is also a risk to the site as it can	To improve sentence syntax.	Typographical correction. No SA

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		result in pollution to water. <del>and development</del> <b>Development</b> in this location will need to take this flood risk constraint into consideration.		implications.
MIN70	CA5 (6)	Development should respect and connect with surrounding areas. Where appropriate, proposals will be expected to enhance townscape around key linkages and junctions, in particular pedestrian and cycle routes from Southwick station and Southwick Green across the lock gates to the beaches, and an improved alignment of the Nautilus House access road serving Allocation Southwick Waterfront and the dry dock.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN71	4.6.1 – 4.6.4	<p>4.6.1 CA6 – Harbour Mouth is split across either side of the River Adur at the mouth of the river. This is the entrance to the harbour. The southern section is also within the area covered by the emerging Shoreham Beach Neighbourhood Plan.</p> <p>4.6.2 <del>On Shoreham Beach is the</del> <b>The</b> remains of Shoreham Fort, a Scheduled Monument, <del>are on</del> <b><u>Shoreham Beach</u></b>. The fort was completed in 1857 and is one of the celebrated south coastal defences built under the Victorian Prime Minister Lord Palmerston. It is of national historical importance and was a vital part of the south coast defence system.</p> <p>4.6.3 A local charity, the Friends of Shoreham Fort supported by Shoreham Port Authority, have taken responsibility for conserving the fort. This area is a popular destination for walkers. It is well used</p>	Due to a printing error, these paragraphs were not included in printed versions of the proposed submission plan. The missing text was unchanged from the 2016 consultation. No representations were received regarding this omission. Paragraph 4.6.2 has been reworded to improve sentence syntax.	Typographical correction/re-wording. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		by anglers and home to the National Coastwatch Institute look-out tower. 4.6.4 In recent years there have been various plans for the fort including local interest for incorporating an educational facility and improving the public toilet block.		
MIN72	4.6.7	The beach itself is designated as a Local Nature Reserve (LNR) and <del>Local Wildlife Site Site-of-Nature Conservation Importance (LWSSNCI)</del> . The designating feature of the LNR is its rare and beautiful flowering vegetated shingle that has adapted over time to the harsh conditions.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
MIN73	4.7.6	A number of the premises along Brighton Road (A259) are coming to the end of their useful life and are no longer ideally suited for modern business needs; either requiring significant investment on-site, or relocation to a better facility elsewhere.	To correct missing punctuation.	Typographical correction. No SA implications.
MIN74	4.7.10	The Western Harbour Arm is subject to a number of environmental constraints which need to be taken into account when planning for the area. These include: <ul style="list-style-type: none"> <li>• Proximity to the Adur Estuary, a Site of Special Scientific Interest (SSSI).</li> <li>• Proximity to Shoreham Beach, a Local Nature Reserve (LNR) and <del>Local Wildlife Site Site-of-Nature Conservation Importance (LWSSNCI)</del>.</li> <li>• Shoreham-by-Sea Air Quality Management Area (AQMA) that covers the town centre and the western part of</li> </ul>	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are <b>shown in red text</b> . Deleted text <b>shown as struck through</b> and additional text <b>shown as underlined</b> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		<p>the Western Harbour Arm.</p> <ul style="list-style-type: none"> <li>• A municipal waste site.</li> <li>• A metal recycling facility. It is proposed that this be relocated</li> <li>• A Health and Safety Executive (HSE) Consultation Zone which determines the distance for different types of development from a ‘major hazard’ based on the current gas storage use. It is proposed that this be relocated.</li> <li>• The presence of contaminated land.</li> <li>• The presence of underground water mains and sewers. This infrastructure needs to be protected and new development needs to ensure its operation remains unaffected.</li> </ul>		
MIN75	4.7.39 – 1 <sup>st</sup> bullet	<ul style="list-style-type: none"> <li>• WH1: 5 Brighton Road. <u>Adur District Council has received an application for full planning permission for 136 dwellings. This site has been purchased by a housing developer. The council is currently engaged in pre-application discussions.</u></li> </ul>	Factual update concerning planning application AWDM/1979/17 received by Adur District Council.	Update to reflect current status of development in this location. No SA implications.
MIN76	4.7.39 – 5 <sup>th</sup> bullet	<ul style="list-style-type: none"> <li>• WH5 – Free Wharf. <u>Adur District Council has granted full planning permission for a development comprising 540 dwellings and over 2,700m<sup>2</sup> commercial floorspace. This site has been purchased by a housing developer. The council is currently engaged in pre-application discussions for a mixed use</u></li> </ul>	Factual update concerning planning application AWDM/1497/17 received by Adur District Council.	Update to reflect current status of development in this location. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
		<del>development.</del>		
MIN77	4.7.55	Despite popular demand, the harbour is currently lacking in good quality, modern waterfront facilities for boat-users and for local residents and visitors to enjoy. It is proposed to increase the number of berths in the harbour for both visitors and <del>new</del> residents through the incorporation of new publicly accessible quays or floating docks/pontoons linked to new developments and open spaces. This will significantly improve the facilities on offer for the boating community and attract visitors <u>into</u> <del>in to</del> the area, supporting the local economy. All new features would be subject to the appropriate environmental approvals processes with the relevant statutory bodies.	To address an issue raised by Shoreham Rowing Club (Representation: JAAP2017-1501h).	No SA implications.
MIN78	5.1.3	Progress on project work is overseen by a Project Board of senior officers and key stakeholders that meets every quarter. In turn, the Project Board reports back to a Leaders' Board comprising the leaders of each council and the Chief Executive of the Shoreham Port Authority. Key decisions are taken through the relevant committees of each authority.	To correct missing punctuation.	Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in red text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	Sustainability Appraisal Screening
MIN79	5.1.8 – 3 <sup>rd</sup> bullet	<ul style="list-style-type: none"> <li>Communications activities to maintain a positive two-way dialogue with land owners, developers and stakeholders; and promote joint working for mutual benefit.</li> </ul>	To correct missing punctuation.	Typographical correction. No SA implications.
MIN80	Para 5.1.20	<p>The following items of infrastructure are typically likely to be requirements for major developments within the allocated sites:</p> <ul style="list-style-type: none"> <li>Contributions to public transport and highway network improvements</li> <li>Upgraded flood defences integrated with public waterfront walking / cycle route (where appropriate – particularly Western Harbour Arm Waterfront sites)</li> <li>Contributions to social infrastructure</li> <li><u>Contributions to green infrastructure</u></li> <li>Remediation of contaminated areas</li> </ul> <p>On-site renewable energy systems / low carbon technologies</p>	To address an issue raised by Sussex Wildlife Trust (Representation: JAAP 2017-1015). The consultee does not suggest that the plan is unsound. However, the proposed amendment clarifies the requirement for development to contribute towards green infrastructure provision.	Developer contributions can be sought for green infrastructure, particularly where they have additional benefits such as providing SUDS, connectivity and so on. This amendment further strengthens the SA assessment against SA objective 6: Protect, enhance, and improve the accessibility of public open space and green infrastructure”. However does not change the SA score.
MIN81	Policy SH10 (3)	Direct agreements with utility providers may be required to provide <u>infrastructure, such as sewerage infrastructure</u> .	To address a formatting error whereby the end of the sentence was omitted from the published version of the <i>Proposed Submission Joint Area Action Plan</i> . This omission was raised by Southern Water (Representation: JAAP2017-0601)	Typographical correction. No SA implications.

## Appendix B SA Screening of main modifications proposed to the Submission Shoreham Harbour Joint Area Action Plan

The schedule below sets out Main Modifications proposed to the Proposed Submission Shoreham Harbour Joint Area Action Plan and results of the SA screening.

Main Modification No:	Reference: (Paragraph, policy or map number)	Amendment: (Amendments are shown in purple text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the <i>Proposed Submission Shoreham Harbour Joint Area Action Plan</i> (2017) unless otherwise stated).	Sustainability Appraisal Screening
MM1	2.1 Vision – 2 <sup>nd</sup> paragraph	The redevelopment of key areas of the harbour will provide benefits for the local community, <u>natural environment</u> and economy through increased investment, improved leisure opportunities, enhanced public realm and the delivery of critical infrastructure that will help respond positively to climate change.	To address an issue raised by Sussex Wildlife Trust (Representation: 2017-1002) and to reflect in the vision the approach to natural capital taken in the JAAP.	The vision itself has not undergone SA assessment, as the aims of the vision are further addressed through policies. The inclusion of text relating to the natural environment is addressed in particular through policies SH6 Flood risk and sustainable drainage, and SH7 Natural environment, biodiversity and green infrastructure. <b>This amendment has no implications on the SA assessment.</b> <b>No change to any previous SA assessments.</b>
MM2	3.1.16 – 3.1.18	<del>3.1.16 As part of the South Quayside Character Area proposals (within Section 4 of this document), there is potential to work with the existing Shoreham Power Station to deliver a district heating network to provide waste heat to local consumers.</del>  <u>3.1.16 Paragraph 97 of the NPPF states that local planning authorities</u>	To address the findings of the <i>Shoreham Harbour Heat Network Study</i> (2016) and the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and to reflect the current status of the Shoreham Heat Network project. The <i>Shoreham Harbour Heat Network Study</i> (2016) found that the low utilisation and the scheduled decommissioning date of the plant means that, unless there are significant changes in operation, Shoreham Power Station cannot be considered as a	These amendments are within the supporting text and provide background information largely in relation to the updated Shoreham Harbour District Energy Feasibility Study (2018). The supporting text relating to opportunities within South Quayside Character Area has been removed, as the 2016 Study found this not to be not feasible. This deletion now better reflects the supporting text of

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		<p><u>should design policies to maximise renewable and low carbon development, and identify suitable areas for renewable and low carbon energy sources. Heating and hot water for buildings account for 40% of UK energy use and 20% of greenhouse gas emissions. The Climate Change Committee estimates that district heating can meet 20% of domestic heating and hot water needs by 2030. The Climate Change Act 2008 obliges the UK to cut 80% emissions by 2050. The Clean Growth Strategy (2017) includes policies to roll out low carbon heating, and phase out the installation of high carbon fossil fuel heating.</u></p> <p>3.1.17 <u>Shoreham Harbour Regeneration Partnership, Adur District Council, West Sussex County Council and Shoreham Port Authority have formed the Shoreham Heat Network Partnership.</u> The Heat Network Delivery Unit (HNDU)<sup>30</sup> has provided part funding to explore the potential for heat</p>	<p>reliable potential heat source. The <i>Shoreham Harbour District Energy Feasibility Study</i> (2018) has updated the findings of the earlier study and carried out feasibility assessment of the identified network. The heat network project partners are now progressing to detailed project development.</p>	<p>CA1.</p> <p>The supporting text now has more information in relation to NPPF requirements and has various statistics and targets relating to energy use.</p> <p>The supporting text now clarifies that it is proposed that the heat network should serve the allocated sites in the Western Harbour Arm as well as some other buildings and sites within the Shoreham town centre area, based on the findings of the updated 2018 study. The supporting text clarifies that all development within this area will be required to connect once complete, or enable future connection to take place.</p> <p>The supporting text now also clarifies that the a heat network sourced by a combination of technologies, rather than one source, would provide a lower risk, more robust solution, and refers to marine source heat pumps, subject to environmental permits.</p> <p><b>All amendments within supporting</b></p>

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		<p>networks in and around Shoreham Harbour. The <i>Shoreham Harbour Heat Network Study</i> (2016) mapped heat demands and identified potentially viable scenarios for network development. <u>The Shoreham Harbour District Energy Feasibility Study (2018) proposes a 2km network serving the allocated sites at the Western Harbour Arm, the site of the former Adur Civic Centre and a number of existing buildings in Shoreham-by-Sea town centre.</u></p> <p><u>3.1.18</u> <u>The study finds that a network served by marine source heat pumps and gas CHP technologies would provide affordable, low carbon heat and the combination of technologies provides a more robust, lower risk solution than a single heat source. Engagement with Shoreham Port Authority has identified the potential for abstraction and discharge points in the mouth of the River Adur, subject to appropriate</u></p>		<p><b>text only and are reflected in changes to policy text, as outlined under MM5 below. See MM5.</b></p>

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		<p><u>environmental permits.</u></p> <p><del>3.1.18</del> <u>3.1.19</u> <u>The heat network partnership is carrying out a detailed feasibility study and preparing the business case for detailed project development of the Shoreham Heat Network. All new development in and around the Western Harbour Arm development is required to connect to the proposed network once complete. Development coming forward before the heat network is delivered is required to be connection ready, and to connect once the network is in place. The council will secure the connection of the approved schemes through planning conditions and/or Section 106 agreements.</u></p> <p><del>The partnership has commissioned a further study to carry out detailed feasibility and business model options appraisals of the potential network. This study will be complete in early 2018. If</del></p>		

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		<p><del>feasible and deliverable, the network may be run by the local authorities or be an independent delivery body or Energy Service Company (ESCO).</del></p> <p><sup>30</sup> HNDU is now part of the Department for Business, Energy and Industrial Strategy (BEIS). It was formerly part of the Department for Energy and Climate Change (DECC), which was abolished in 2016.</p> <p>Subsequent paragraphs in Section 3.1 renumbered to reflect additional paragraph</p>		
MM3	Policy SH1 (4)	Developers should demonstrate how they can contribute towards <u>the regeneration partnership's Shoreham Port Authority's</u> objective of becoming a hub for renewable energy generation.	To reflect that this is a shared objective of all regeneration partners.	This modification will not change how policy is implemented or what is delivered. <b>This amendment has no implications on the SA assessment.</b> <b>No change to SA assessment for SH1 from this amendment.</b>
MM4	Policy SH1 (5)	<u>The partnership will support proposals for renewable and low carbon energy generation, including solar photovoltaics.</u> All new development will be expected to incorporate low and zero carbon, decentralised energy opportunities.	To address an issue raised by Sussex Wildlife Trust (Representation: 2017-1005). Although the representor considers the plan sound, the proposed modification better reflects the references to renewable and low carbon energy generation in the background text, as well as the approach to renewable and low carbon energy generation in Policy 19: Decentralised	The newly added first sentence is a strong indication that low and zero carbon proposals will be supported. This amendment strengthens the policy and has positive impacts for the SA Objective 1: "Increase energy efficiency..." The score for this objective is already positive, and although the policy is

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			energy, Stand-alone Energy Schemes and Renewable Energy of the <i>Adur Local Plan</i> 2017.	considered to strengthen the positive impact, it does not change the previous SA score. <b>No change to SA score for SH1 in relation to this modification.</b>
MM5	Policy SH1 (6)	<u>The councils will support the development of district heat networks and associated infrastructure.</u> Development in areas identified in the <u><i>Shoreham Harbour District Energy Feasibility Study (2018)</i></u> <del><i>Shoreham Harbour Heat Network Study (2016)</i></del> , or subsequent update, will be <u>required</u> <del>expected</del> to connect to district heating networks where they exist, or incorporate the necessary infrastructure for connection to future networks.	To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.	The newly added first sentence is a strong indication that heat networks and associated infrastructure will be supported. The amendment from “expected” to “required” is a stronger policy position. The policy refers to the updated Study, and that development within certain areas identified within the study will be required to connect to networks or provide for future for future connection. The area within which development is now required to connect, or provide for future connection is the Western Harbour Arm area, as described within the supporting text. This provides a clearer policy position than the previous version, as it was not clear from the 2016 study which areas were identified. It is noted that the Western Harbour Arm area should provide the majority of the residential development from within

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				<p>the JAAP area and approximately half the employment floorspace, therefore delivery of district heating within this area would have greater positive outcomes in relation to protecting against future fuel poverty of residents in particular. In addition, the study indicates connection to some existing residential development, therefore potentially reducing any fuel poverty associated with these existing buildings. The amendment also refers to associated infrastructure and from the supporting text, it is proposed that marine source heat pumps would provide this heat source. This infrastructure would involve pipes within the water (in the Harbour mouth area) and can result in a temperature change to the water. This could have impacts on marine ecology.</p> <p>The amendments strengthen the policy in relation to SA Objectives 1: “Increase energy efficiency...”; and objective 11: “Improve health and well-being...”. However, there is potential for adverse impact on</p>

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				<p>ecology resulting from the infrastructure, resulting in an adverse uncertain impact for SA objective 4: “conserve, protect and enhance biodiversity and habitats”.</p> <p><b>The scores for objectives 1 and 11 are already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score for these objectives. However, the score has been changed for objective 4, and therefore the policy requires re-assessment in relation to this modification.</b></p>
MM6	Policy SH6 (1)	<p><u>The partnership will support the delivery of measures to mitigate flood risk and coastal erosion in the regeneration area.</u> Development proposals in the regeneration area must comply with the principles and approach to flood risk management set out in the <i>Shoreham Harbour Flood Risk Management Guide</i> (2015), or subsequent <u>updated guidance and must take account of the most up to date flood risk management evidence and policy in consultation with the relevant authorities, including the Environment Agency.</u> <del>Where development creates new or alters flood flow routes, the site specific Flood Risk Assessment must</del></p>	<p>To address issues raised by Hopegar Properties Ltd (Representation JAAP2017-1204) and the Environment Agency (Late Representation: JAAP 2017-2001). Hopegar Properties Ltd suggest that the plan is unsound as it does not include sufficient details of the required flood defence measures proposed in The Shoreham Harbour Flood Risk Management Guide. The representation suggests that the policy should include specific reference to improving the lock gates at Southwick, and a commitment to specific flood defence</p>	<p>The newly added first sentence is a strong indication that flood risk and coastal erosion mitigation measures will be supported and provide further support to implementation of other policy requirements within SH6.</p> <p>The amended text regarding the consideration of guidance and evidence helps to future proof the policy.</p> <p>The amendments strengthen the</p>

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		<del>assess the potential flood hazard posed by them to ensure that flood risk is not increased elsewhere.</del>	measures. The councils do not consider this appropriate. The Shoreham Harbour Flood Risk Management Guide in a Supplementary Planning Document in its own right. The JAAP requires proposals to comply with the principles and approach it contains. The background text refers to wider strategies on flood risk and coastal erosion management. The councils do not accept that the plan is unsound. However, the proposed amendment makes reference to supporting mitigation measures. The Environment Agency suggest that the plan is unsound as it does not make reference to the climate change allowances, and because parts of the Shoreham Harbour Flood Risk Management Guide are out of date. The councils do not accept that the plan is unsound. However, the proposed amendment removes the date, allowing for an update to the Flood Risk Management Guide, and makes clear that any subsequent evidence and policy will be taken into account. The amendment also corrects a drafting error whereby clause 3 of Policy SH6 was replicated at the end of clause 1.	policy and have positive impacts for the SA objectives 10: “Ensure all developments have taken into account the changing climate and are adaptable to extreme weather events” and objective 18: “ Avoid, reduce and manage the risk from all sources of flooding to and from development and minimise coastal erosion where possible”.  <b>Both scores for these objectives are already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score for these relevant objectives for this policy.</b> <b>No change to SA assessment for SH6 in relation to this modification.</b>
MM7	Policy SH7 (7)	Where impacts on biodiversity cannot be avoided or mitigated, compensatory <u>actions</u> <del>measures</del> will be required, taking account of an up-to-date	To respond to an issue raised by the Environment Agency (Late Representation 2017-2003).	This amendment provides further details on how /where compensatory habitat should be provided.

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		ecological survey. <u>Like-for-like compensatory habitat should be provided at or close to the site, subject to agreement with the relevant authorities, including Natural England and the Environment Agency.</u>		<p>The amendment strengthen the policy and has positive impacts for the SA objective 4: “Conserve, protect and enhance biodiversity and habitats”.</p> <p><b>The score for this objective is already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score for this relevant objectives. No change to SA assessment for SH7 in relation to this modification.</b></p>
MM8	CA6 Area priorities	<ul style="list-style-type: none"> <li>• To support the conservation of Shoreham Fort.</li> <li>• To enhance connections between Shoreham town centre, Shoreham Beach and Shoreham Fort through environmental and landscaping improvements.</li> <li>• To support the redevelopment of Shoreham Rowing Club and enhance the public realm environment of Kingston Beach.</li> <li>• To explore options for the future use of the Albion Street lorry park.</li> <li>• To support Adur Homes in exploring options for redevelopment of housing sites.</li> <li>• <u>To support the delivery of the Shoreham</u></li> </ul>	<p>Due to a printing error, the area priorities were not included in printed versions of the Proposed Submission plan. The five priorities were unchanged from the 2016 consultation. The priorities are reflected in the policies, so this does not affect the intent of the plan</p> <p>No representations were received regarding this omission.</p> <p>A sixth priority is added to reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.</p>	<p>The area priorities were within the version of the JAAP that was considered by the SA.</p> <p>The additional priority relating to delivery of the Shoreham Heat Network is addressed within the policy itself. <b>See MM10.</b></p>

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		Heat Network		
MM9	4.6.16 – new paragraph	<p><u>The Shoreham Heat Network Partnership is progressing the delivery of a district heating network. The Shoreham Harbour District Energy Feasibility Study (2018) proposes a network served by marine source heat pumps and gas CHP. The study identifies the Middle Pier at the mouth of the harbour as a potential abstraction point for marine source heat pumps, and a discharge point to the west of the lifeboat station.</u></p>	<p>To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.</p>	<p>This new paragraph is within the supporting text and provides background information relating to the type and location of energy infrastructure relating to the provision of a heat network. This paragraph confirms that marine source heat pumps are proposed, and identifies the harbour mouth area as a location for the abstraction points and discharge points.</p> <p><b>This is considered further under MM10.</b></p>
MM10	CA6 (9) – new clause	<p><u>The council will support the development of infrastructure to deliver the Shoreham Heat Network.</u></p>	<p>To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.</p>	<p>As described under MM9, the updated Study proposed that marine source heat pumps could provide the energy source for the future heat network and that the pumps and pipework would be located within the harbour mouth area.</p> <p>This new clause reflects the need to provide this infrastructure in this location and provides a strong signal that development of infrastructure will be supported within this area.</p> <p>Provision of a heat network will have positive implications for SA objective 1: “Increase energy efficiency...” and SA objective 11: “Improve health and</p>

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				<p>wellbeing...". This is a change from the previous SA assessment, whereby the policy was found to have no impact on objective 1. In addition, marine source heat pump infrastructure will comprise pipework within the water, can result in a change in temperature and can have impacts on the ecosystem, potentially having adverse impacts on SA objective 4: "conserve, protect and enhance biodiversity and habitats". This is also a change from the previous SA.</p> <p><b>This modification has potential to change the previous SA assessment for some of the SA objectives and requires a re-assessment of the policy.</b></p>
MM11	CA7 Area priorities	<ul style="list-style-type: none"> <li><u>To support the delivery of the Shoreham Heat Network</u></li> </ul>	Added priority to reflect the findings of the Shoreham Harbour District Energy Feasibility Study (2018); and the current status of the Shoreham Heat Network project.	The additional priority relating to delivery of the Shoreham Heat Network is addressed within the policy itself. <b>See MM12.</b>
MM12	4.7.74 – 4.7.76 new paragraphs	<u>Shoreham Heat Network</u>  <u>4.7.74 The Western Harbour Arm allocation is identified in the Shoreham Harbour District Energy Feasibility Study (2018) for the</u>	To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.	These new paragraphs are within the supporting text and provide background information in relation to the updated Shoreham Harbour District Energy Feasibility Study

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		<p><u>planned Shoreham Heat Network. This aims to provide low carbon, affordable warmth to residents and businesses. The district heating project is being developed by the Shoreham Heat Network Partnership, comprised of Shoreham Harbour Regeneration, Adur District Council, West Sussex County Council and Shoreham Port Authority.</u></p> <p><u>4.7.75 New development in and around the Western Harbour Arm development will be required to connect to the proposed network once complete. Development coming forward before the heat network is delivered is required to be connection ready, and to connect once the network is in place. Planning conditions and obligations will be applied to other development in order to futureproof connection at a later date.</u></p>		<p>(2018).</p> <p>The new paragraph states that new development within this character area will be required to connect to the heat network or to be connection ready if it comes forward before the heat network is delivered.</p> <p><b>The amendments are within the supporting text only and are reflected in changes to policy text, as outlined under MM13 below. See MM13.</b></p>
MM13	CA7 new clauses	<p>Insert new clauses after (2):</p> <p><u>3. Proposals for sites WH1 and WH2 will be required to demonstrate that potential implications for the safety of navigation have been addressed in agreement with statutory bodies, including Shoreham Port Authority.</u></p> <p><u>4. The council will support the development of the Shoreham Heat Network. Until the network is constructed, development will be</u></p>	<p>To reflect recent representations from Shoreham Port Authority on planning applications in the Western Harbour Arm, with potential to impact on port navigation. To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.</p>	<p>New clause 3 is considered to indirectly positively impact upon the SA objective 11: "Improve health..." as it will ensure the safety of ships and their crew, and also objective17: "promote sustainable economic development..." as will ensure that ships can continue to safely navigate the harbour. Impacts on these objectives were mixed in the previous assessment due to health</p>

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		<p><u>required to incorporate the necessary infrastructure for connection to future networks. When the network is constructed, development will be required to connect.</u></p> <p>Renumber subsequent clauses accordingly</p>		<p>and economic benefits and implications of the policy, and although this new policy criteria strengthens the positive impact, it is not considered to significantly change the previous score, which is still considered to be mixed. <b>No change to previous SA resulting from this change.</b></p> <p>New clause 4 provides strong support for delivery of Shoreham Heat Network and provides clear policy that all new development within this character area will be required to connect to the network once constructed, or to incorporate necessary infrastructure (e.g. pipework) to provide for future connection. This requirement is considered to impact positively for SA objective 1: “Increase energy efficiency” as will provide a renewable source of heat and therefore help to conserve energy, and SA objective 11: “improve health” as may help to reduce the risk of future fuel poverty for residents. As described under MM10, marine source heat pump</p>

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				<p>infrastructure could resulting changes to water temperature and would require pipework to be installed in the water which could have adverse ecological impacts and potentially have adverse impacts on SA objective 4: “conserve, protect and enhance biodiversity and habitats”.</p> <p>Impacts on all these objectives were mixed in the previous assessment due to the amount of development to be delivered within the character area and the consumption of energy that this will result in, due to other health implications arising from the policy, and due to the risk of development in this location on designated sites. The new <b>policy criteria strengthens the positive impact for SA objectives 1 and 11, and increases the risk of adverse impacts against SA objective 4, however they are not considered to significantly change the previous scores for these objectives, which are all considered to be mixed. No change to previous SA.</b></p>
MM14	CA7 (11)	Developments should be set back <u>sufficiently</u> from	To respond to an issue raised by Hyde New	Amended clause 11 is considered to

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		the A259 corridor to <u>provide space for a high-quality cycle route, deliver green infrastructure improvements, and</u> prevent a canyoning effect and to ensure that residents are protected from noise and air quality impacts <u>in agreement with the highways and planning authorities.</u>	Build Ltd (Representation: 2017-0402, and to reflect the LPAs proposals for green infrastructure and cycle facility along the A259.	<p>impact positively on SA objective 13: “Promote sustainable transport...” and SA objective 4: “Conserve, protect and enhance biodiversity...” and links strongly to existing clauses 10, which refers to the delivery of a waterfront pedestrian and cycle route, and clause 14 which refers to incorporating trees and vegetation along the waterfront route.</p> <p>Impacts on all these objectives were mixed in the previous assessment due to the amount of development to be delivered within the character area and the potential for transport movements to increase, due to the risk of development in this location on designated sites. <b>The amended policy criteria strengthens the positive impact for SA objectives 4 and 13, however they are not considered to significantly change the previous scores for these objectives, which are all considered to be mixed. No change to previous SA.</b></p>



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