

## Appendix A Matters Statement 1B

### Assessment of Reasonable Alternatives of Relevance to the JAAP & SA findings

Options considered	Commentary and SA Findings
<b>Adur Core Strategy: Issues and Options (September 2005)</b>	
	The Issues and Options document set out possible options in relation to the Environment; Homes and Jobs; Shopping and Town Centres; Regeneration; Transport; and Community.
<b>H1 The Amount of New Homes:</b> <ol style="list-style-type: none"> <li>i. 2,100 new homes in the urban area</li> <li>ii. 2,600 new homes (the above plus 500 at Shoreham Harbour)</li> <li>iii. Provision of 2,600 new homes (some on greenfield sites)</li> </ol>	The SA found that the provision of higher amounts of housing would have more detrimental impacts on natural resources and the environment. However, it would provide more homes as well as business and service opportunities. Building on greenfield sites had additional negative impacts on the landscape and such sites might have higher car dependence.
<b>SH1 Shoreham Harbour:</b> <ol style="list-style-type: none"> <li>i. Secure major infrastructure required to regenerate area</li> <li>ii. Only pursue limited regeneration activities in this area</li> </ol>	Major regeneration would have significant positive economic and social impacts. However, it would trigger additional environmental damage and resource use.
<b>Brighton &amp; Hove Core Strategy: Issues and Options (October 2005)</b>	
<b>Approach to Growth:</b> <ul style="list-style-type: none"> <li>• A – Accessibility-led-approach</li> <li>• B – Regeneration-led approach</li> <li>• C – Urban character/urban capacity-led approach</li> <li>• D – Limited development and expansion on the urban fringe</li> <li>• E – identification of large strategic development sites to provide at least 1,000 new homes in each case</li> </ul>	<p>The Issues and Options document set out five possible approaches to accommodating the predicted development of the city over the next 20 years. It was anticipated and explained that the preferred option would be likely to consist of a combination of two or more of these broad approaches.</p> <p>The SA appraised options A-D and the business as usual scenario.</p> <ul style="list-style-type: none"> <li>• Option A suggested concentrating development around existing city, town and district centres (including Boundary Road/Station Road).</li> <li>• Option B suggested directing development to Neighbourhood Renewal Fund areas (including South Portslade)</li> <li>• Option C referred to the Tall Buildings Study which identified Shoreham Harbour as suitable for taller buildings.</li> </ul>

Options considered	Commentary and SA Findings
<ul style="list-style-type: none"> <li>Business as usual</li> </ul>	<ul style="list-style-type: none"> <li>Option E included the suggestion of significant land reclamation at Shoreham Harbour. However this approach was rejected as undeliverable and was not appraised as an option.</li> </ul> <p>The main findings of the appraisal were:</p> <ul style="list-style-type: none"> <li>None of the approaches should be applied in isolation.</li> <li>Approach C should form part of the preferred option and should take into account the Open Space Study findings.</li> <li>Approach A had the greatest potential for reducing car use but could have wider negative impacts if applied in isolation.</li> <li>The identified deprived areas (approach B) should be included in the preferred option, but not for significant higher-density housing until social and employment issues had been addressed.</li> <li>It may be necessary to allow limited development on the urban fringe to relieve the carrying capacity of city.</li> <li>Protection of natural resources and environmental enhancement should be an integral part of the preferred approach.</li> <li>The business as usual approach is not a sustainable one in the longer term.</li> </ul>
<b>Adur Core Strategy: Preferred Options (June 2006)</b>	
	<p>The preferred option for providing new homes was 2,600 new homes, including 500 at Shoreham Harbour, if the necessary infrastructure is in place.</p> <p>The preferred option for Shoreham Harbour was to support the long-term regeneration of the harbour area to provide a significant amount of new jobs, homes and leisure facilities. This would involve a review of the Shoreham Maritime Vision and the development of a Joint Area Action Plan with Brighton &amp; Hove City Council.</p> <p>The SA found that there would be a good number of positive social and economic benefits although as a potentially large development site it could result in negative environmental impacts unless mitigation measures are put in place. As a large brownfield site this has an environmental advantage.</p>
<b>Brighton &amp; Hove Core Strategy: Preferred Options (November 2006)</b>	
<ul style="list-style-type: none"> <li>SH1 – to support the ongoing</li> </ul>	<p>The preferred option for accommodating growth was a combination of approaches A and</p>

Options considered	Commentary and SA Findings
<p>regeneration of the seafront south of the A259 to provide jobs, homes and leisure facilities</p> <ul style="list-style-type: none"> <li>• Do nothing</li> </ul>	<p>C. The Spatial Strategy directed significant mixed-use, high density development to ten areas of the city, including Western Seafront (Kingsway and Wellington Road). The preferred option for Shoreham Harbour was to include in the Core Strategy a policy to support the long-term regeneration of the Shoreham Harbour area to provide a significant amount of new jobs, homes and leisure facilities. This would involve a review of the Shoreham Maritime Vision to ensure that it is deliverable socially, economically and environmentally, and the development of a Joint Area Action Plan with Adur District Council.</p> <p>The Sustainability Appraisal considered the preferred option together with a ‘business as usual’ option and noted that the two did not differ greatly. In view of the fact that the long term effects, and the deliverability, of regenerating the harbour were unknown, the appraisal recommended a change of policy wording to state that the Core Strategy would include:</p> <p>“A policy that recognises the long term regeneration of Shoreham Harbour could be viable to providing a significant amount of new jobs, homes and leisure facilities as long as the social, economic and environmental deliverability can be shown”. In response, this proposed change was not accepted as the wording was not considered to be pro-active or supportive enough, given the findings of community involvement, and did not accord as well with the Adur Core Strategy Preferred Options.</p>
<b>Adur Core Strategy: Submission (January 2007)</b>	
	<p>The options for provision of homes and regenerating Shoreham Harbour were carried through from the Preferred Options Stage (see above). Policy RE1 – Regeneration was amended to emphasise the importance of working with BHCC on the regeneration of the harbour. Policy SH1 – Shoreham Harbour was amended to reflect the importance of the port in receiving and processing aggregates. Text was also added in relation to flood risk. The SA made the following mitigation recommendations:</p> <ul style="list-style-type: none"> <li>• All new development to be built in accordance with BREEAM standards and incorporate sustainable energy generation measures.</li> <li>• Need to minimise impact of new road.</li> <li>• Provision of new greenfield open spaces within the development.</li> <li>• Creation of new opportunities for nature sites and biodiversity.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Ensure management plan for construction.</li> <li>• Enhancement of fishing industry and need to ensure conservation area is protected.</li> <li>• Need to replace beach.</li> <li>• Need to ensure proximity of commercial and residential does not create problems i.e. screening, landscaping, noise mitigation, etc.</li> <li>• Incorporate measures to reduce car usage and improve public transport.</li> <li>• Encourage cleaner industries.</li> <li>• Safe crossing points needed across A259 to access services.</li> <li>• Provide less car parking, improve public transport. Look at Local Transport Plan for HGV use improvements.</li> </ul> <p>The Core Strategy was subsequently withdrawn due to the Inspector's concerns on the following issues:</p> <ul style="list-style-type: none"> <li>• Lack of details as to the delivery of development, particularly at the Harbour, Airport and Cement works.</li> <li>• The evidence base and how this had informed the Core Strategy (particularly with regard to flooding and highway impact)</li> <li>• Uncertainty regarding the deliverability of housing sites (e.g. flooding and highway impact constraints)</li> </ul>
<b>Brighton &amp; Hove Core Strategy: Revised Preferred Options (June 2008)</b>	
<p><b>DA7 (Shoreham Harbour)</b></p> <ol style="list-style-type: none"> <li>1. Ad-hoc market-led approach.</li> <li>2. To consider major regeneration at Shoreham Harbour and South Portslade with the aim to create a highly sustainable neighbourhood adhering to the latest standards for sustainable development delivery through an Area Action Plan.</li> </ol>	<p>This identified seven broad locations for development based on the findings of Area Assessments, including Shoreham Harbour / South Portslade. The potential for Shoreham Harbour for accommodating development was re-examined at the Revised Preferred Options stage in light of proposals put forward by SEEDA at that time. Due to the early stage of technical assessments, no contribution from developments in the area to the strategic requirements of the Core Strategy was assured. Therefore, the SA covered only the principle and potential of redevelopment at Shoreham Harbour.</p> <p>The SA found that Option 1 would not meet the open space needs of future population, is unlikely to improve transport infrastructure, may result in piecemeal residential development and result in a missed regeneration opportunity for the area, may not tackle local health inequalities nor benefit the wider community. The SA concluded that Option 2</p>

Options considered	Commentary and SA Findings
	was the most positive approach.
<b>Brighton &amp; Hove Core Strategy: Proposed Amendments (June 2009)</b>	
<p><b>Shoreham Harbour options:</b></p> <p>1 – Employment led regeneration with numbers of housing and jobs to be agreed</p> <p>2 – 5,500 dwellings</p> <p>3 – 8,000 to 8,700 dwellings</p> <p>4 – 10,000 dwellings</p> <p>5 – No development, reliance on windfall</p>	<p>Shoreham Harbour was identified as a New Growth Point by the government and was identified as a Strategic Development Area in the South East Plan capable of providing 10,000 new homes. The site covered an area administered by BHCC and ADC. Therefore the planning proposals would be delivered through a Joint Area Action Plan (JAAP) as well as being submitted as part of each authority's Core Strategy.</p> <p>At this stage, the Shoreham Harbour policy included five possible options for delivery, as background evidence to guide the development potential of the area was still incomplete. The SA findings were:</p> <ul style="list-style-type: none"> <li>• Option 2, which suggests significant levels of development, but not enough to generate critical infrastructure, such as flood and transport, was found to be unviable and performed negatively against all objectives.</li> <li>• Option 5 was found to perform negatively against most objectives, as may not deliver affordable housing, would be unlikely to generate additional infrastructure and would miss the regeneration potential of the port.</li> <li>• Options 1, 3 and 4 had more potential for positive impacts particularly amongst the more social and economic objectives, assuming that levels of development were sufficient to deliver critical infrastructure, however were found to have more scope for more significant negative impacts against the environmental objectives, with negative impacts increasingly significant with option 4.</li> <li>• Overall the SA found there to be a critical point at which development becomes feasible and viable due to provision of infrastructure, however development shouldn't be significantly above this level to minimise the potential for environmental impacts.</li> </ul>
<b>Adur Core Strategy: Issues and Options (June 2009)</b>	
	<p>Shoreham Harbour was identified as a New Growth Point by the government and was identified as a Strategic Development Area in the South East Plan capable of providing 10,000 new homes. The site covered an area administered by BHCC and ADC. Therefore the planning proposals would be delivered through a Joint Area Action Plan (JAAP) as well as being submitted as part of each authority's Core Strategy.</p>

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	The Core Strategy would include a broad location for new development, with the detail to be progressed through the JAAP itself. The SA noted that four options for development at the harbour had been assessed as part of the JAAP process (see below).
<b>Shoreham Harbour Draft Joint Area Action Plan (June 2009)</b>	
	Note: Neither the Draft JAAP or its accompanying SA were completed or subject to public consultation.
<p><b>Phase 1:</b></p> <ul style="list-style-type: none"> <li>• Option A – Do nothing</li> <li>• Option B – The development of 10,000 new homes and 7,750 new jobs with a new link road linking the A259 with the A27</li> <li>• Option C – The development of 10,000 new homes and 7,750 new jobs without a new link road</li> <li>• Option D – The development of 7,750 new homes and 6,000 new jobs with a new link road linking the A259 with the A27</li> <li>• Option E – The development of 7,750 new homes and 6,000 new jobs without a new link road</li> </ul>	<p>Bell Cornwell Environmental was commissioned to undertake the first phase of the SA process. This assessed five options for the overall scale of development. The SA found that without the JAAP and the adoption of a comprehensive approach to key infrastructural constraints such as flood risk management and transport new development would be piecemeal and small-scale, and areas of existing development would become more susceptible to flooding. The area would therefore continue to experience difficulties in making a suitable contribution to the sub-regional economy, and future economic growth across the sub-region may suffer as a result. Additional findings were</p> <ul style="list-style-type: none"> <li>• Most of the SA Objectives would be more effectively met by one of the regeneration options than under the do nothing option.</li> <li>• The SA demonstrated a weight of preference in favour of the larger scale options.</li> <li>• Where the Link Road is identified as a significant consideration, initial results suggest that the larger scale option with the Link Road could be the best sustainable transport option.</li> <li>• However, early findings from ongoing transport modelling show that the Link Road would be more likely to transfer congestion, rather than to solve the problem. Thus, the relative benefits and adverse impacts of the Link Road require further analysis.</li> <li>• The preference for the smaller scale options is expressed in terms of water quality, concern over water supply, biodiversity, countryside amenity and the potential overcrowding of open spaces within Shoreham Harbour.</li> </ul>
<p><b>Phase 2:</b></p>	<p>A second phase of the SA was begun by the SEEDA appointed JAAP team. This included the following options:</p> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• Provide a rapid transit system from Worthing to Brighton along the A259 to serve the development area</li> </ul>

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	<ul style="list-style-type: none"> <li>• Provide a new link road route from the A259 to the A270</li> <li>• Close 4 level crossings and replace with alternative bridges/tunnels</li> <li>• Include a dedicated HGV route along Church Road/Trafalgar Road</li> <li>• Provide new pedestrian and cycle bridges across the harbour and canal</li> </ul> <p><b>Economy</b></p> <ul style="list-style-type: none"> <li>• Create new opportunities to provide a wider range of employment choice within the Harbour area</li> <li>• Relocation of employment to sites within the Shoreham Harbour JAAP area</li> <li>• Relocation of employment to sites outside Shoreham Harbour JAAP area but within Adur/Brighton and Hove</li> <li>• Provision of training and skills facilities</li> </ul> <p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• To provide the majority of new family housing within the communities of Shoreham and Portslade</li> <li>• In Shoreham provide the majority of new dwellings as low rise</li> <li>• In Portslade provide (i) the majority of new dwellings as low rise with some landmark tall buildings or (ii) the majority of new dwellings in five to six storey apartments</li> </ul> <p><b>Open space and outdoor recreation</b></p> <ul style="list-style-type: none"> <li>• Improve and enhance opportunities for water-based activities (e.g. Beach, yachting)</li> <li>• Create new green spaces within the development areas with links to existing open spaces outside the development</li> <li>• create minimal open space within the development but create links to a strategic country park</li> </ul> <p><b>Port development</b></p> <ul style="list-style-type: none"> <li>• Retain the distribution of uses around the Port as it is, with rationalisation of existing land uses and redevelopment as sites come forward (without land reclamation)</li> <li>• Relocate port-related uses to an area of reclaimed land</li> <li>• Provide a new bridge across the harbour, linking into the principle road network</li> </ul> <p><b>Retail</b></p> <ul style="list-style-type: none"> <li>• Include a large number of small retail units throughout the development</li> </ul>

Options considered	Commentary and SA Findings
	<ul style="list-style-type: none"> <li>• Provide large new superstore facilities concentrated at each end of the development</li> </ul> <p><b>Community Facilities</b></p> <ul style="list-style-type: none"> <li>i. Provide new primary and secondary schools rather than</li> <li>ii. enlarge and/or enhance existing schools</li> <li>i. Provide new health facilities rather than</li> <li>ii. enlarge and/or enhance existing health facilities</li> <li>i. Provide new community halls rather than</li> <li>ii. enlarge and/or enhance existing halls</li> <li>i. Provide new indoor sports provision rather than</li> <li>ii. enlarge and/or enhance existing provision</li> </ul> <p><b>Waste and Energy (Sustainable Living)</b></p> <ul style="list-style-type: none"> <li>• Include a waste facility serving beyond the needs of the new community</li> <li>• Include a CHP system to serve the new development</li> <li>• Maximise Micro-generation of renewable energy on individual sites within the development</li> </ul> <p>Appraisal of the options was not completed due to emerging viability concerns. The proposals assumed a comprehensive land purchase and site assembly approach via a public sector-led 'special purpose vehicle' so that private sites could be prepared and brought ready to the market. However, given the complexities of land ownerships and the range of different circumstances and aspirations of land owners it was difficult to make assumptions about the realistic costs and logistical implications (for example in terms of time delays) of this approach. Therefore the site assembly costs were difficult to determine upfront and in reality could have significantly increased the already large funding gap (due to infrastructure provision and land reclamation). Much of the burden of this significant cost would have been borne by public sector funders in the early phases of development as opposed to being staged throughout the 25yr development therefore increasing the upfront risk.</p>
<b>Brighton &amp; Hove Core Strategy: Submission (February 2010)</b>	
<p><b>Shoreham Harbour options:</b></p> <ol style="list-style-type: none"> <li>1. Comprehensive large scale redevelopment, with land</li> </ol>	<p>This stage included seven Development Area policies including strategic allocations for new development. All policies were final, with the exception of the policy for Shoreham Harbour, which included three options for delivery.</p>

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<p>reclamation from the sea</p> <p>2. Comprehensive large scale redevelopment, without reclamation from the sea</p> <p>3. Smaller scale redevelopment without reclamation from the sea</p>	<p>The SA found option 1 likely to deliver greater amounts of housing and other development than options 2 and 3, but had much greater potential for significant environmental impacts due to land reclamation. There were also concerns over viability of this option.</p> <p>The SA found option 2 to still have significant potential for positive social and economic impacts, but again found the adverse environmental impacts to also be of significance. Again, studies indicate that the level of development associated with this option may not be enough to generate the significant level of infrastructure required.</p> <p>The SA found option 3 likely to achieve positive social and economic impacts, but that these would not be as significant as the other options. Again, adverse environmental impacts were considered likely, although not as significant as other options.</p> <p>The SA stated that without the completion of studies, and information on the amounts of development to be delivered, that it was difficult to complete an accurate assessment, however stated that an option that did not include reclamation from the sea would be more environmental preferable.</p> <p>The Core Strategy was subsequently withdrawn due to soundness issues and anticipated changes to national planning policy.</p>
<b>Adur Core Strategy: Housing and Employment Options (June 2011)</b>	
	<p>ADC consulted on four housing options and two employment options for the district. The consultation document noted the ongoing partnership work on the JAAP to bring forward regeneration and improvements to the harbour area. It stated that “a recently completed capacity study has indicated a possible scale of development over the plan period at Shoreham Harbour of between 1,600 – 2,000 new homes and approximately 2,600 new job opportunities. Of these approximately 1,190 could be built within the Adur District Council area, (1,050 of these up to 2028) and the remainder in the Brighton &amp; Hove City Council area.</p>
<b>Brighton &amp; Hove City Plan: Policy Options Papers (October 2011)</b>	
	<p>Following withdrawal of the Core Strategy, four policy options papers were produced covering the following subjects:</p> <ul style="list-style-type: none"> <li>• Housing Delivery</li> <li>• Employment and Economic Development</li> <li>• Park &amp; Ride</li> </ul>

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<p><b>Housing Delivery Options Paper:</b></p> <ol style="list-style-type: none"> <li>1. 9,800 new homes all within the built up area of the city.</li> <li>2. 11,200 new homes mainly within the built up area of the city, and development on a greenfield site (Toads Hole Valley).</li> <li>3. 13,500 new homes with development on Greenfield site (as option 2), plus total loss of 11.5ha of employment sites and 23ha of open space to housing.</li> <li>4. 15,800 new homes with development on a Greenfield site (as options 2 and 3), plus total loss of 23ha of employment sites and 46ha of open space to housing.</li> </ol>	<ul style="list-style-type: none"> <li>• Student Housing</li> </ul> <p>Options 2, 3 and 4 all included mixed use development on some employment sites and some development at Shoreham Harbour. The paper noted that studies had concluded that the 10,000 homes scenario in the South East Plan, which would have involved significant land reclamation and relocation of port activities were undeliverable. It stated that the local authorities were working together with the Port to draw up revised plans for the harbour. It stated that:</p> <p>“Development will be taken forward on a jointly planned basis. It is now anticipated that future development could provide up to 2,000 new homes and 2,400 new jobs for local people and businesses over the next 20 years. Within the Brighton &amp; Hove part of the regeneration area, it is anticipated that up to 400 units of housing could be achieved.”</p> <p>Overall the SA found option 2 to be the preferred option. Although option 1 resulted in fewer significant negative impacts than other options, it also resulted in fewer significant positive impacts and performed the least well against the housing objective. Options 3 and 4 both performed positively against the housing objective; however these options performed negatively against the employment and economic development objectives, due to the loss of employment sites, on the transport and air quality objectives, and also against the objective relating to preservation of local sites due to the loss of open space. Although positive, the performance of these options against the health objective was also the lowest. Although option 2 had potential for some negative impacts, mainly due to the development of a Greenfield site, the SA considered these could be avoided with mitigation and that overall this option had more potential for significant positive impact than other options, particularly relating to employment, economic development and health. The numerical target for housing was considered achievable given the constraints of the city.</p>
<p><b>Employment Options Paper:</b></p> <p>Option 4) More mention of strategic employment sites in DA policies:</p> <ol style="list-style-type: none"> <li>i. No specific allocation of primary employment sites within Development Area proposals and leave site allocations to City Wide</li> </ol>	<p>The identified strategic employment sites included South Portslade. This included the vision to support the long term regeneration of Shoreham Harbour and immediately surrounding areas. The plans for the Harbour will deliver the regeneration objectives of addressing housing need, improving the quality, variety and availability of employment and training opportunities as well as raising the quality of the waterfront environment for the benefit of local communities and visitors. The plans will also help to implement the adopted Shoreham Port Masterplan, supporting a thriving, modern, consolidated Port.</p>

Options considered	Commentary and SA Findings
<p>Plan Part 2.</p> <p>ii. Specific allocation of primary employment sites and their roles within Development Areas (with sites identified in options paper)</p>	<p>The SA found that Option 4(ii) had greater potential for positive impacts on a range of objectives as well as more certainty than option 4(i) due to sites being named with the relative impacts on site-based objectives able to be assessed. The naming of sites was found to provide certainty for the business community and developers and was found in particular to have potential for positive impact on the objectives relating to employment, economic development and health.</p> <p>In addition, the sites identified were found to have an overall positive impact on biodiversity, reducing car journeys, preventing pollution to water, engaging local communities, making the best of previously developed land and increasing access. The majority of sites are located within areas of deprivation, therefore having potential to reduce deprivation through provision of employment, however this is uncertain.</p> <p>The sites identified had potential for mixed impacts on objectives relating to air quality, maintaining local distinctiveness and provision of housing.</p> <p>The Inner Harbour site and South Portslade site are both situated within Flood Zone 3b and may be at risk of coastal flooding.</p> <p>The impact on whether any of the sites offer potential for development of contaminated sites is uncertain, and will require further investigation into the sites.</p>
<b>Brighton &amp; Hove Draft City Plan Part One (May 2012)</b>	
<p>Policy DA8: Shoreham Harbour</p>	<p>This included Strategic Objective 6: Maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port-users and visitors through a long-term regeneration strategy.</p> <p>Policy DA8: Shoreham Harbour outlined that a JAAP was being prepared in partnership with ADC, WSCC and the Port. It identified Shoreham Harbour as a broad location for development with the capacity to accommodate 400 new residential units and 7,500m<sup>2</sup> net additional employment floorspace (within Brighton &amp; Hove). It included priorities for each of seven character areas within the harbour area.</p> <p>The SA found that:</p> <ul style="list-style-type: none"> <li>• The policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of housing, employment and economic development with the regeneration of the harbour and surrounding area the key aim of the policy. The policy should result in delivery of a mix of housing, new employment floorspace and</li> </ul>

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	<p>intensification of existing vacant or under-used space, with potential to increase the output of the port.</p> <ul style="list-style-type: none"> <li>• The policy is likely to have a positive impact on objectives relating to maintaining local distinctiveness through improvements to the surrounding public realm and townscape; and should bring about improvements in accessibility through improved linkages with surrounding areas, including the Boundary Road District Centre and local beaches.</li> <li>• The policy is also likely to result in remediation of contaminated land and result in better use of previously developed land.</li> <li>• The assessment found the policy had potential for an overall negative impact on the objectives relating to improving air quality and reducing car journeys. New housing and employment-based development, as well as increased output of port-based activities may result in an increase in journeys made and HGV movements to and from the area. However, the SA supports the priority to improve access to the North Quayside Area as this may bring about localised improvements to air quality elsewhere within the area.</li> <li>• The impacts on the objectives relating to health are mixed, as although the policy should bring about health benefits, such as access to employment, housing and open space, the potential for air quality to worsen overall due to an increase in traffic movements could have an impact on health.</li> <li>• The assessment also found the policy to have potential for negative impact on the objectives relating to pollution to water resources, and significant negative impact on the objectives relating to coastal flood risk and adapting to climate change. Parts of the development area are located in areas at risk of surface water flooding, are located in flood zones 3a and 3b in relation to tidal flooding, with the risk and extent of tidal flooding anticipated to increase as a result of climate change.</li> </ul> <p>The SA recommended the following amendments to the policy:</p> <ul style="list-style-type: none"> <li>• Air quality monitoring (2010) shows that the annual mean objective for NO<sub>2</sub> has been exceeded at certain roadside locations in South Portslade, including the Trafalgar Road and Wellington Road/Basin Road junction monitoring sites. The SA recommends including a reference to improving air quality under Character Area 3 – North Quayside / South Portslade.</li> <li>• The SFRA 2012 shows that the site is partially within Flood Zones 2 and 3a and that</li> </ul>

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	<p>development in the area will need to be planned sequentially to reduce risk to vulnerable uses. The SA recommends adding the following text to Character Areas 2 and 3:</p> <ul style="list-style-type: none"> <li>○ Character Area 2: To accommodate carefully located residential developments as part of mixed use redevelopment schemes incorporating the findings of the SFRA 2012 and any subsequent revisions.</li> <li>○ Character Area 3: ...including some appropriately located mixed-use residential development incorporating the findings of the SFRA 2012 and any subsequent revisions.</li> </ul>
<b>Shoreham Harbour Development Briefs: Options Report (September 2012)</b>	
<p><b>Western Harbour Arm:</b></p> <ul style="list-style-type: none"> <li>• Option 1 – Road retained</li> <li>• Option 2 – Realigned waterfront</li> </ul> <p><b>South Portslade Industrial Estate:</b></p> <ul style="list-style-type: none"> <li>• Option 1 – Comprehensive redevelopment</li> <li>• Option 2 – Organic change</li> </ul> <p><b>Aldrington Basin</b></p> <ul style="list-style-type: none"> <li>• Option 1 – Rich mix of commercial uses</li> <li>• Option 2 – Introduction of residential uses</li> </ul>	<p>Both options envisaged the long term redevelopment of the area as a predominately residential neighbourhood. Option 1 suggested a courtyard structure with employment uses at ground floor level and improved access to the waterfront. This approach retained the existing Brighton Road (A259) on its current alignment. Option 2 proposed a more radical approach, realigning the A259 to run along the waterfront.</p> <p>Both options for South Portslade Industrial Estate envisaged the redevelopment of the area as a residential-led mixed use development. Option 1 proposed the comprehensive redevelopment of the area as a residential neighbourhood. Option 2 proposed a more incremental approach leading to a mixed-use scenario. Both options envisaged improved integration of the area into surrounding streets through new road and pedestrian links.</p> <p>Option 1 proposed a mixture of commercial uses alongside existing employment and port uses. This included retail and niche visitor attractions adjacent to Hove Lagoon and improvements to the public realm. Option 2 proposed the introduction of residential uses to a limited number of sites</p>
<b>Shoreham Harbour Development Briefs: Background and Emerging Proposals (October 2012)</b>	
<ul style="list-style-type: none"> <li>• Emerging proposals</li> <li>• No Development Briefs</li> </ul>	<p>This set out the scenarios identified for each area and outlined the direction of travel and progress towards a preferred option. None of the options presented in the Development Briefs: Options Report was taken forward as originally proposed.</p> <p>For the Western Harbour Arm, given the complex land-ownerships and the likelihood of development coming forward at different times, the realignment of the A259 has been ruled out and is not considered a reasonable option. The emerging proposals envisaged</p>

Options considered	Commentary and SA Findings
	<p>an additional route along the waterfront which would improve access to developments. In South Portslade, the need to retain employment space ruled out the comprehensive redevelopment of the area. This is not therefore considered a reasonable option. Instead it suggested that a limited number of specific sites could be released from employment use.</p> <p>In Aldrington Basin, the need to retain port-operational and other employment uses ruled out the wider introduction of residential development. This is not therefore considered a reasonable option. The emerging proposals suggested a limited amount of residential development fronting Kingsway and a mixture of commercial uses on specific sites. Initial SA was carried out by a panel of officers drawn from a range of disciplines and representing the Partnership, ADC, BHCC, WSCC and the EA. The panel appraised both the emerging proposals and the alternative of not producing a plan.</p> <p>Although the emerging proposals did not score particularly highly in terms of meeting the SA objectives, the appraisal panel found that there were likely to be a number of significant positive impacts as a result of the proposals in the report. The alternative of not preparing a Development Brief scored far more negatively.</p> <p>The impacts of the emerging proposals were considered uncertain for more than half of the objectives. Many of these objectives were not directly addressed in the report, and the panel was therefore unable to determine the likely impacts.</p> <p>The panel considered it essential that the Development Brief directly address the SA objectives of the Shoreham Harbour regeneration project. The panel felt that further detail and clarification might allow some of these appraisals to be reconsidered, and a more positive score awarded.</p> <p>The panel also made specific recommendations in relation to each of the SA objectives. The impacts of adopting the proposals in the Draft Development Brief were considered likely to be more positive than the alternative option of not preparing Development Briefs.</p>
<b>Draft Adur Local Plan (September 2012)</b>	
<p><b>Housing:</b></p> <ul style="list-style-type: none"> <li>Option A – 2,835 dwellings (including 1,050 at Shoreham Harbour) up to 2028</li> </ul>	<p>This set out two options for future housing targets. Both included 1,050 dwellings at Shoreham Harbour.</p> <p>Strategic Objective 3a was “to achieve strategic development at Shoreham Harbour, delivering housing and jobs; creating social, economic, environmental, and infrastructure</p>

Options considered	Commentary and SA Findings
<ul style="list-style-type: none"> <li>Option B – 3,685 dwellings (including 1,050 at Shoreham Harbour) up to 2028</li> </ul>	<p>improvements which benefit Adur, its businesses, residents and visitors, contributing to the prosperity of the South East region.</p> <p>Draft Policy 6: Planning for Economic Growth allocated up to 26,000m<sup>2</sup> of employment generating floorspace at the harbour. SA found this policy had a number of social and economic benefits but scores negatively in relation to a number of environmental objectives including minimising flood risk. These negative impacts reflect the limited amount of land within the Built Up Area for new development to meet employment needs, and the need for some greenfield sites to meet these needs.</p> <p>Draft Policy 7: Shoreham Harbour Regeneration Area identified 7 character areas within the Harbour and identified key priorities for each area including, amongst other things, supporting Shoreham Port in improving operational efficiencies, environmental improvements, improved access to the waterfront and mixed use development in the western arm of the harbour.</p> <p>SA found that this policy generally scored positively and had a number of social, economic and environmental benefits. The policy only scores negatively with regard to flood risk which reflects the coastal location of the district, the presence of the River Adur and the subsequent lack of available sites to meet development needs in areas with a low risk of flooding. It recommended that the policy contain more information on the proposed flood defence network as well as including something on improved north/south links from/to the Harbour.</p>
<b>Shoreham Harbour Development Brief – Consultation Drafts (January 2013)</b>	
	<p>These included an Illustrative Framework for each area and a set of Guiding Principles in relation to the following issues:</p> <ul style="list-style-type: none"> <li>Land use</li> <li>Urban design</li> <li>Environmental</li> <li>Development considerations.</li> </ul> <p>The Western Harbour Arm brief proposed the following:</p> <ol style="list-style-type: none"> <li>1. Phased release of sites for a residential-led mix of uses</li> <li>2. Delivery of approximately 1,050 residential units in a range of tenures and sizes</li> <li>3. Incorporation of an integrated employment strategy including new jobs</li> </ol>

Options considered	Commentary and SA Findings
	<ol style="list-style-type: none"> <li>4. Creation of new retail space</li> <li>5. Delivery of a new waterfront route</li> <li>6. Improved Brighton Road (A259) corridor</li> <li>7. Creation of new open spaces</li> <li>8. Integration of a flood management strategy.</li> </ol> <p>The South Portslade Industrial Estate and Aldrington Basin brief proposed the following:</p> <ol style="list-style-type: none"> <li>1. Managed release of sites for development</li> <li>2. Delivery of approximately 400 residential units in a range of typologies</li> <li>3. Creation of approximately 10,000m<sup>2</sup> new fit for purpose employment space.</li> <li>4. Recommendation for the definition of a new core employment area through the JAAP process</li> <li>5. Improved A259 corridor</li> <li>6. Improved connections with Hove seafront and lagoon through landscape and wayfinding</li> <li>7. An appropriate approach to scale and massing</li> <li>8. Improve the cycle route / public right of way which follows Basin Road South</li> </ol> <p>Most of the recommendations of the SA of the emerging proposals were addressed through the guiding principles. As a result the scores at this stage were amended to reflect this. Full details are included in the Consultation Draft SA which accompanied each Development Brief.</p> <p>The Draft Development Briefs and SAs were subject to a period of public consultation prior to the preparation of the final briefs (see below).</p>
<b>Brighton &amp; Hove Submission City Plan Part One (February 2013)</b>	
Policy DA8: Shoreham Harbour	Policy DA8 was amended to reflect the SA recommendations made at the Draft stage (see above). Other changes to policy include: new requirement to accommodate future capacity requirements relating to waste water; improve access to all beaches (not just Southwick beach as in former version); deletion of wording “comprehensive development approach” relating to North Quayside/South Portslade; requirement to improve the beach environment, under Portslade and Southwick Beaches, and consideration of decentralised energy infrastructure, such as heat networks.

Options considered	Commentary and SA Findings
	<p>Changes to supporting text include confirmation of key role of JAAP, further information about the Port's importance for handling minerals and the safeguarding of minerals wharves required by the Brighton &amp; Hove and East Sussex Waste &amp; Minerals Local Plan; information relating to waste water treatment; and the locations potential suitability for providing a district heating network.</p> <p>The SA found that although there are numerous changes to the supporting text, the policy itself remains largely unchanged and the majority of the changes strengthen the policy but have no further impact on the SA. However, the new requirement relating to waste water capacity impacts positively on the relevant SA objective (7) and is a change from the previous position.</p> <p>Conclusion: update SA to incorporate change and allow for other minor amendments to text.</p>
<b>Shoreham Harbour Development Briefs (July 2013 / September 2013)</b>	
	<p>Following the period of formal public consultation on the Draft Development Briefs a number of changes were made. These are summarised below. The full summary of the consultation, representations and officer responses is available in the separate Consultation Summary for each brief.</p> <p>The guiding principles in section 5 were reordered to reflect the nine strategic objectives for the regeneration project. Each objective now has a number of principles attached. This makes it clearer to demonstrate how the Development Brief contributes to achieving each of these objectives. A number of guiding principles were split into several new principles. For example the principles on Energy in the Draft Development Briefs correspond to principles on Building Standards and Energy in the finished Development Brief. A number of new guiding principles were added. These include Infrastructure and Utilities, Contributions to social infrastructure and Transport Infrastructure Contributions. Many of the guiding principles were amended to reflect the consultation representations. Much of the explanatory text was moved from section 5 to section 4. This section was renamed Area Proposals and Priorities.</p> <p>During the consultation period, very few substantive representations were received in relation to the SA. A small number did comment specifically on particular SA objectives. These have been addressed in the SA Addendum reports which accompanied each brief</p>

Options considered	Commentary and SA Findings
<b>Revised Draft Adur Local Plan (September 2013)</b>	
	<p>Revised Draft Policy 3: Housing Provision included 1,050 dwellings within the Western Arm of Shoreham Harbour.</p> <p>Revised Draft Policy 4: Planning for Economic Growth included 13,000m<sup>2</sup> for employment generating uses within the Shoreham Harbour Regeneration Area.</p> <p>Amendments to Revised Draft Policy 8: Shoreham Harbour Regeneration Area included the following additional priorities for the Western Harbour Arm:</p> <ul style="list-style-type: none"> <li>• To improve townscape and access arrangements to create better linkages to Shoreham town centre and surrounding areas.</li> <li>• To enhance the area's natural biodiversity by incorporating multi-functional green space.</li> </ul> <p>The SA found that the policy generally scored positively and had a number of social, economic and environmental benefits. It identified a number of potential conflicts with a number of environmental objectives including water quality, biodiversity, pollution and flood risk. However the policy sought to address these conflicts and it was considered that these potential impacts could be mitigated. The issues would need to be carefully addressed at the planning application stage. It recommended that the policy contain information regarding improved north/south links from/to the harbour, sustainable transport and mitigation of impacts on the Adur Estuary SSSI.</p>
<b>Draft JAAP (Feb 2014)</b>	
	<p>At this stage, the SA assessed the draft policies in the JAAP against the SA Framework and did not assess alternative options.</p> <p>The SA found the plan to have potential for positive impacts such as improved land use efficiency, delivery of new housing and employment, protection of heritage assets, improved access to open space, facilitate remediation of land, improve the design of the built environment, encourage high sustainable buildings standards, promote sustainable transport, facilitate flood defences, facilitate social and community infrastructure. Adverse impacts identified include increased congestion and associated transport impacts, potential damage to some habitats, increased consumption of resources, disturbed nature conservation, risk of water pollution, increased waste.</p> <p>The SA made some recommendations to changes to policies including South Quayside</p>

Options considered	Commentary and SA Findings
	<p>policy to refer to the Port's objective of becoming a renewable energy hub; Portslade &amp; Southwick Beaches policy to refer to the remediation of Basin Road South SNCI and to protect it from future disturbance; Fishersgate &amp; Southwick Waterfront policy to refer to the protection of coastal grassland and refer to the safeguarding of port operational areas; Harbour Mouth policy to refer to improved access to the car park; Western Harbour Arm policy to require a setback along Brighton Road and to reflect the priority for the area of becoming an exemplar sustainable development; Sustainable Development policy should refer to locally required CSH and BREEAM standards; Economy and Employment policy to refer to locally required BREEAM standards; Recreation and Leisure policy to refer to the enhancement of open space where on-site provision cannot be made.</p>
<b>Proposed Submission Adur Local Plan (Sep 2014)</b>	
<p>Includes Policy 8 Shoreham Harbour Regeneration Area</p>	<p>Policy 3: Housing Provision included 1,100 dwellings within the Western Arm of Shoreham Harbour.</p> <p>Policy 4: Planning for Economic Growth included 16,000m<sup>2</sup> for employment generating uses within the Shoreham Harbour Regeneration Area.</p> <p>Policy 8: Shoreham Harbour Regeneration Area included revisions reflecting the above housing and employment targets and also was revised to contain information regarding improved north/south links from/to the Harbour as well as more information on mitigation of impacts on the River Adur SSSI.</p> <p>The SA found the policy has a number of social, economic and environmental benefits but there is potential for negative impacts on some of the environmental objectives including water quality, biodiversity, the countryside, historic environment, green infrastructure, pollution, and minimising flood risk. The policy aims to minimise/mitigate these impacts as far as possible but these issues would need to be carefully addressed at the planning application stage.</p>
<b>Brighton &amp; Hove City Plan Proposed Modifications (Oct 2014)</b>	
<p>Spatial Strategy: Option 1: no change to spatial strategy Option 2: Revised spatial strategy to include urban fringe as a broad source</p>	<p>Following the Inspectors' initial conclusions after the EIP, BHCC were directed to revisit opportunities for maximising housing delivery.</p> <p>SA considered options to amend the spatial strategy to include housing on the urban fringe and concluded that although neither option would meet the full OAN, option 2 would have greater positive impacts for housing and economic growth than option 1; that both options</p>

Options considered	Commentary and SA Findings
<p>of potential for housing.</p> <p>Housing Delivery:  Option 1: 13,210 dwellings  Option 2: 24,000 dwellings (through loss of open space and employment land to housing)</p>	<p>could result in adverse environmental effects and that the more significant adverse impacts associated with option 2 were those related to distribution of development rather than the increased amount of population. Option 2 was the preferred option.</p> <p>SA also considered options of delivering a revised housing target based on the revised spatial strategy and the option of delivering the OAN. SA found that option 2 had greater potential for significant positive impacts for housing delivery however these positive effects would be outweighed by some of the adverse impacts, particularly those relating to loss of employment sites and loss of open space within the urban area which would be required to meet the OAN. Option 1 was the preferred option.</p> <p>At this stage, the SA also assessed proposed modifications to a number of policies, including DA8: Shoreham Harbour which was revised to include a reduced housing target (300 homes), clarified that Aldrington Basin was a Strategic Employment Area, references to maximising sustainable energy use, references to seek air quality improvements and references to improve legibility/permeability.</p>
<b>Brighton &amp; Hove City Plan Further Modifications (July 2015)</b>	
	<p>This stage considered whether the option of delivery the revised OAN of 30,000 homes was a reasonable alternative. This was discounted as a reasonable alternative, based on the findings of the SA at the previous stage.</p> <p>No further options were considered and no further changes to DA8 Shoreham Harbour took place at this stage.</p>
<b>Amendments to the Proposed Submission Adur Local Plan (March 2016)</b>	
	<p>Various changes to policy 8 took place, including requiring a “minimum” of 1,100 dwellings to be delivered, added a new reference to district heat networks, designated Southwick Waterfront as a strategic employment site and designated Western Harbour Arm as a strategic mixed-use site.</p> <p>The SA concluded the policy would have a number of long-term social, economic and environmental benefits but there is potential for negative impacts on some of the environmental objectives including water quality, biodiversity, the countryside, historic environment, green infrastructure, pollution, and minimising flood risk. The policy aims to minimise/mitigate these impacts as far as possible but these issues would need to be</p>

Options considered	Commentary and SA Findings
	carefully addressed at the planning application stage.
Revised JAAP (Dec 2016)	
	<p>At this stage, the SA assessed the draft policies in the revised JAAP against the SA Framework and did not assess alternative options.</p> <p>At this stage the SA concluded that the plan could have positive effects such as: Provision of energy infrastructure and district heating network, Measures to reduce water consumption, Delivery of SUDS to minimise risk of water pollution, Remediation of contaminated land, Improved land use efficiency, Safeguarding of sites of biodiversity value, Increase in green infrastructure including creation of green corridor, Enhancement of historic assets, Improved access to existing open space, Delivery of new open space, Measures to promote sustainable travel, Improvements in flood defence, Delivery of the wider determinants of health, including increased opportunities for active lifestyles, Opportunities to reduce deprivation, Delivery of housing, Delivery of employment opportunities, Improved and increased access to a range of services and facilities, Improved streetscapes and public realm; and adverse effects such as Increased energy consumption, Increased water consumption, Pollution of water, Loss of intertidal habitats, Risk of flooding in certain locations, Worsening of air quality, Increased congestion, and Increased waste generation.</p> <p>The SA made some recommendations including: Economy &amp; Employment to include a reference to securing training and job opportunities; Housing &amp; Community to include requirement to provide for community and social infrastructure; Fishersgate &amp; Southwick to include a reference to securing training and job opportunities; and Western Harbour Arm to include a reference to securing training and job opportunities.</p>
Submission Adur Local Plan: Inspector's Main Modifications (June 2017)	
	<p>Following the EIP, a number of main modifications were put forward including some to Policy 8 Shoreham Harbour including referring to the 16,000sqm employment floorspace as a minimum, indicating that 12,000sqm should come forward in the Western Harbour Arm and 4,000sqm in Southwick Waterfront and some further modifications for clarity.</p> <p>The SA found that the modifications would not have an impact on the conclusions of the previous SA for this policy.</p>

Options considered	Commentary and SA Findings
Submission JAAP (Nov 2016)	<p>At this stage, the SA assessed the draft policies in the revised JAAP against the SA Framework and did not assess alternative options.</p> <p>At this stage the SA concluded that the plan could have positive effects such as incorporation of low and zero carbon energy infrastructure including infrastructure to connect to future networks, measures to conserve water resources, improvements in tidal flood defences, delivery of SUDS, minimising the risk of water pollution and surface water flood risk, remediation of contaminated land, net gains in biodiversity in particular Habitats of Principal Importance, improved green infrastructure network including creation of green corridor and improvements to areas of vegetated shingle and intertidal habitats, improved access to existing open space and delivery of new open space, improved connectivity throughout and to the JAAP area, improvements to the road network, and measures to promote sustainable travel and reduce the need to travel by car, delivery of some of the wider determinants of health, including opportunities for active lifestyles, provides opportunities to reduce inequalities, such as through increased access, through district heating and through employment and housing opportunities, delivery of different types of housing including affordable housing, safeguarding of some existing, and delivery new employment floorspace of a range of types, creation of training and employment opportunities, including those for local residents, safeguarding of port-operational activity, improved land use efficiency, improved and increased access to a range of services and facilities, improved access to the waterfront, well-designed developments that respect the local area, including the historic built environment where relevant and contribute towards improved streetscapes, and improved public realm.</p> <p>The SA found the plan could have some adverse effects such as potential for an overall increase in energy consumption resulting from increased population; 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; potential increased transport movements resulting from increased population; potential worsening of air quality resulting from increased transport movements, potential for noise issues resulting from increased transport and incompatibility of neighbouring uses;</p>

<b>Options considered</b>	<b>Commentary and SA Findings</b>
	potential for an overall increase in waste generation resulting from increased population. The SA made one recommendation at this stage to the Fishersgate and Southwick policy to include a reference to taking into account the findings of the SFRA and Flood management Guide SPD.