

Representation Form:

Main Modifications to the Shoreham Harbour Joint Area Action Plan

PART B – Your representation

Please answer the questions below and clearly explain your comments in the relevant sections. Please complete a separate Part B for each representation. You may use as many additional sheets as necessary.

3. Which document would you like to make a representation on?

Please indicate **one** document only:

- Proposed Main Modifications to the Shoreham Harbour Joint Area Action Plan (Please go to Question 2))
- Sustainability Appraisal Addendum (Please go to Question 8)

2. Which Main Modification does this representation relate to?

Please provide a main modification number:

Main modification no:	02
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3. Do you support, support with amendments or object to the document:

Please indicate yes or no to each question:

- 3.1 Support
- 3.2 Support with amendment
- 3.3 Object

4. As a result of this Main Modification, do you consider the Shoreham Harbour Joint Area Action Plan to be:

Please indicate yes or no to each question:

- 4.1 Legally compliant? Yes No
- 4.2 Sound? Yes No

5. Do you consider the Shoreham Harbour Joint Area Action Plan to be unsound because it is not:

Please complete **only** if you indicated no to 4.2

- 5.1 Positively prepared?
- 5.2 Justified?
- 5.3 Effective?
- 5.4 Consistent with national policy?

6. Why do you consider the Shoreham Harbour Joint Area Action Plan, as a result of this Main Modification, to be unsound, or not legally compliant?

Please complete **only** if you answered no to 4.1 and/or 4.2.

Please be as precise as possible and refer to background and supporting documents if necessary. Please continue on a separate sheet if necessary.

Natural England welcomes the insertion of 'natural environment' to the Vision, as it recognises the importance of nature in achieving sustainable development.

7. What change is necessary to this Main Modification in order to make the plan sound and legally compliant?

Please complete **only** if you answered no to 5.1 or 5.2

Please set out suggested or revised wording to address the issue you have raised in question 5. Please explain why this change will make the plan sound or legally compliant. Please continue on a separate sheet if necessary.

n/a

8. Which part of the SA Addendum does this representation relate to?

Please provide a paragraph number:

Paragraph no:

9. Do you have any comments on the Sustainability Appraisal Addendum?

Please complete **only** if your representation is on the Sustainability Appraisal Addendum

Please continue on a separate sheet if necessary.

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- Sustainability Appraisal Addendum (Please go to Question 8)

2. Which Main Modification does this representation relate to?

Please provide a main modification number:

Main modification no:	11
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3. Do you support, support with amendments or object to the document:

Please indicate yes or no to each question:

- 3.1 Support
- 3.2 Support with amendment
- 3.3 Object

4. As a result of this Main Modification, do you consider the Shoreham Harbour Joint Area Action Plan to be:

Please indicate yes or no to each question:

- 4.1 Legally compliant? Yes No
- 4.2 Sound? Yes No

5. Do you consider the Shoreham Harbour Joint Area Action Plan to be unsound because it is not:

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Please be as precise as possible and refer to background and supporting documents if necessary. Please continue on a separate sheet if necessary.

Whilst Natural England supports the addition of reference to the use of up to date ecological information in the first sentence of Policy SH7 (4), we recommend amendments set out below. This is because the modification currently implies that it is the provision of ecological information that will ensure no net loss of biodiversity. Therefore, we suggest the following amendment: *'All development applications must be accompanied by up to date ecological information ~~to~~ ensure no net loss and seek to provide a net gain to biodiversity...'*

Natural England supports the modified wording in Policy SH7 (7) relating to 'like-for-like' compensatory habitat. This modification is necessary to ensure the policy is effective at conserving biodiversity, and particularly the intertidal habitats that are important in the JAAP area.

We support the amendments to the supporting text at paragraph 3.7.2. This is helpful to clarify to developers what is expected in terms of impact assessments.

Natural England also support the addition of supporting text at paragraph 3.7.3. However, we recommend the strategy referred to in this text is added as a clause to Policy SH7.

Natural England has worked with Adur DC, the Environment Agency and Sussex Wildlife Trust to develop a 'Guidance note for applicants within Adur DC that have developments that have the potential to cause significant (harmful or negative) impacts to intertidal habitats'. This guidance states that Adur DC is developing a strategy to address the issue of providing like for like intertidal compensatory habitat, and that once the strategy is completed the developer may wish to consider this strategic approach to providing compensatory habitat. The guidance note is already being provided to applicants within the JAAP area and will be placed on Adur DC's website.

We recommend that the Policy SH7 is modified to bring it into line with the guidance note, by referencing the intertidal habitat strategy with wording that is consistent with the guidance note.

7. What change is necessary to this Main Modification in order to make the plan sound and legally compliant?

Please complete **only** if you answered no to 5.1 or 5.2

Please set out suggested or revised wording to address the issue you have raised in question 5. Please explain why this change will make the plan sound or legally compliant. Please continue on a separate sheet if necessary.

Natural England suggests adding the following as a clause within Policy SH7:
Adur District Council will develop a strategy to address the issue of providing like-for-like intertidal compensatory habitat. Once the strategy is completed, the developer may wish to consider this strategic approach for the provision of like-for-like compensatory habitat.'

8. Which part of the SA Addendum does this representation relate to?

Please provide a paragraph number:

Paragraph no:	<input type="text"/>
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9. Do you have any comments on the Sustainability Appraisal Addendum?

Please complete **only** if your representation is on the Sustainability Appraisal Addendum

Please continue on a separate sheet if necessary.