

Shoreham Harbour Joint Area Action Plan
Sustainability Appraisal/Strategic Environmental Assessment
Post Adoption Statement, November 2020
Regulation 16 of The Environmental Assessment of Plans and Programmes Regulations
2004

1 Introduction

- 1.1 The Shoreham Harbour Joint Area Action Plan (JAAP) was adopted by the three local authorities as follows:
- West Sussex County Council - 18th October 2019
 - Brighton & Hove City Council – 24th October 2019
 - Adur District Council – 31st October 2019
- 1.2 This followed the Examination in Public in September 2018, and one round of modifications in 2019 that the Planning Inspector directed the councils to make in order to ensure the JAAP was sound. The Planning Inspector’s Report confirming the JAAP was sound, subject to modifications, was received on 7th August 2019.
- 1.2 In preparing the JAAP, the Council undertook a parallel process of Strategic Environmental Assessment and Sustainability Appraisal. Strategic Environmental Assessment (SEA) is required by European Directive EC/2001/42 (SEA Directive) and is focused on the environmental implications of implementing plans and policies. It was transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004 (‘SEA Regulations’). Sustainability Appraisal (SA) is required by the Planning and Compulsory Purchase Act (2004) in order to ensure that sustainability considerations are integrated into the plan making process. As with SEA, SA is concerned with the environmental impacts of implementing development plans, but it also carries a wider remit that includes social and economic considerations.
- 1.3 Good practice guidance (National Planning Practice Guidance) advises that the requirements for both SEA and SA can be met through a single appraisal process. The councils have applied this approach in appraising the JAAP. Therefore, throughout the remainder of this statement, reference to Sustainability Appraisal implies both SA and SEA.
- 1.4 This Sustainability Appraisal Post Adoption Statement has been prepared in accordance with Regulation 16 (4) of the SEA Regulations. It describes how environmental considerations have been integrated into the JAAP, how the environmental report has been taken into account, how consultation responses have been taken into account, and summarises the reasons the JAAP was chosen, in light of other reasonable alternatives considered. The statement also sets out the measures that will be used to monitor the effects of the JAAP.

1.5 As the SA and SEA process have been integrated throughout the preparation of the JAAP preparation process, this statement addresses not only environmental aspects but also the wider sustainability (social and economic) aspects.

1.6 The remainder of this statement is set out by headings which reflect the requirements of the SEA Directive and Regulations.

2 How environmental and wider considerations have been integrated into the JAAP

2.1 The JAAP is a strategy for regeneration of Shoreham Harbour and surrounding areas. It sets out the planning policy framework for the area up to 2032 and builds on and complements the Adur Local Plan (2017) and the Brighton & Hove City Plan Part 1 (2016). It sets clear policies that will guide decisions on planning applications within the JAAP area, with decisions being taken in accordance with the JAAP and the relevant local plans.

2.2 The JAAP has undergone various stages of preparation. These stages are described in more detail in section 3. At each stage, the JAAP objectives, options and/or policies have been appraised against the Sustainability Appraisal Framework which has ensured environmental, economic and social considerations have been integrated into the plan.

2.3 The first stage of the Sustainability Appraisal process was the production of the Scoping Report. A Scoping Report was produced in [February 2012](#) and then updated in [December 2012](#). These built upon and updated a number of previous SAs and Scoping Reports produced at early stages including

- Scoping Report and Strategic Environmental Assessment (SEA) for the Adur District Council Core Strategy DPD (ADC: 2011).
- Sustainability Appraisal of the Brighton & Hove Core Strategy Proposed Submission Document (BHCC: 2010)
- Draft Sustainability Appraisal and Environmental Report on Shoreham Harbour Joint Area Action Plan (Bell Cornwell Environmental/Shoreham Harbour Regeneration: 2009).

2.4 The Scoping Report served as the scoping report for all planning policy documents produced as part of the Shoreham Harbour Regeneration Project, which also included Development Briefs. Within this Scoping Report, information on relevant plans, strategies and programmes, as well as baseline data covering social, economic and environmental issues was collated in order to identify key sustainability issues for the city. These issues were used to inform development of a series of sustainability appraisal objectives that formed the SA Framework against which the emerging JAAP was assessed. The SA Framework was then applied throughout the

subsequent preparation stages. The Sustainability Appraisal Objectives included environmental, social and economic objectives, ensuring a broad scope for sustainability considerations. The SA Objectives are listed as follows:

- 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.
- 2 Encourage the sustainable use of water.
- 3 Improve land use efficiency by encouraging the 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 and enhance public open space / green infrastructure and accessibility to it
- 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 are 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 to improve integrated transport links with them.
- 20 Create places and spaces and buildings that work well, wear well and look good.
- 21 Raise educational achievement and skills levels to enable people to remain in work, and to access good quality jobs.
- 22 Reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

2.5 The SA Framework has been used as a basis to appraise the JAAP through its various iterations. It has appraised the strategic objectives, options and policies and has

enabled the identification of positive, negative and cumulative effects. The appraisals, using the SA Framework as a tool, have ensured the integration of sustainability considerations into the JAAP.

3 How the Sustainability Appraisal/Environmental Report has been taken into account

3.1 Production of the JAAP has been carried out as an iterative process, with the plan's strategic options and options for policies being subject to a comparative assessment and policies being further refined at various stages.

3.2 The following table shows the various stages of the JAAP that have been undertaken. At each stage, there has been an equivalent stage of sustainability appraisal. At each stage, where appropriate, the JAAP was developed and modified to take into consideration the Sustainability Appraisal findings.

Table 1 to show stages of plan making and associated stage of SA

Date	Plan-making stage	SA stage
Feb 2012		SA Scoping Report
Dec 2012	Shoreham Harbour Development Briefs	Updated SA Scoping Report
Feb 2014	Draft JAAP	Draft JAAP SA
Dec 2016	Revised Draft JAAP	Revised Draft JAAP SA
Nov 2017	Proposed Submission JAAP	Proposed Submission SA
May 2018	Submission JAAP with proposed modifications	Proposed Modifications SA Addendum
January 2019	Main Modifications to the JAAP	Main Modifications SA Addendum

3.3 The following paragraphs summarise how the SA findings were taken into account at each stage of preparation.

Scoping Stage

3.4 At this stage the SA Scoping Report was produced. The Scoping Report helped to identify the social, economic and environmental issues that needed to be addressed in the JAAP and helped to identify which other plans and programmes had a bearing on the JAAP.

3.5 The SA Scoping Report also included an assessment of the JAAP Strategic Objectives, however although some potential conflicts were identified, no change to the objectives took place, as the Strategic Objectives themselves were considered to

provide mitigation against the potential conflicts and it was considered that the JAAP would need to ensure that any concerns or conflicts were balanced.

Draft JAAP

3.6 At this stage, the environmental context was updated where necessary and the SA assessed Strategic Objectives and the 32 draft JAAP policies, which included 11 policies for the 7 Character Areas. The SA process made 11 recommendations for revisions to policies.

Revised Draft JAAP

3.7 At this stage, the environmental context was updated where necessary and the SA assessed Strategic Objectives, the 10 revised draft Harbour-wide policies and 7 Character Area policies. The SA process made 4 recommendations for revisions to policies.

Proposed Submission JAAP

3.8 At this stage, the environmental context was updated where necessary and the SA assessed the Strategic Objectives, the 10 Harbour-wide policies and the 7 Character Area policies. The SA process made 1 recommendation.

Proposed Modifications to the Submission JAAP

3.9 Prior to the submission of documents for examination, the SA carried out an assessment of the 95 proposed modifications being put forward as part of the Submission JAAP to enable the implications of the JAAP, as modified, to be understood. This assessment resulted in the full re-assessment of 2 policies. This document was not consulted upon, however formed part of the Examination document. No recommendations were made at this stage.

Main Modifications to the JAAP (post EIP)

3.10 Following the Examination in Public, the SA carried out an assessment of the 102 proposed modifications being put forward to make the plan sound. This assessment resulted in full re-assessment of four policies. No recommendations were made at this stage.

3.11 To summarise, SA has been fully integrated into the process of plan production. The SA has highlighted key issues and made certain they have been taken into account. SA undertaken as part of the Adur Local Plan and Brighton & Hove City Plan has enabled a comparative assessment of options to be undertaken, and the SA of the JAAP has made recommendations to enhance policies and has suggested mitigation.

4 How the results of any consultations have been taken into account

- 4.1 As shown in Table 1, there have been many stages of plan preparation, each of which has undergone widespread public and stakeholder consultation with the exception of the May 2018 SA Addendum which was produced for the Inspector's consideration. Consultation always included the main planning document, the Sustainability Appraisal report, the SA Non-technical summary and any other supporting documents relevant to each stage.
- 4.2 Consultation was always in accordance with the relevant Town & Country Planning Regulations and the councils' adopted Statements of Community Involvement. Specifically, in accordance with Regulation 13 of the SEA Regulations, consultation always included the three statutory environmental bodies; Natural England, Environment Agency and Historic England.
- 4.3 Following each stage of consultation, a Consultation Statement was produced detailing what consultation was undertaken, where and with whom, and providing details of all representations received. Consultation Statements for all stages can be found on the [Submission Documents](#) List on the JAAP Examination page on Adur & Worthing council's website. At all stages of plan production prior to examination stage, an officer response was provided showing how the representations were taken into account. Following the examination, the consultation statements did not include an officer response, as at these later stages representations were for consideration by the Planning Inspector.
- 4.4 In addition to the Consultation Statements, each SA report prior to the examination has included details of the representations received at the previous stage that were specific to the SA. This also included a response to show how the comments were taken into account. The brief summaries set out below indicate how some of the representations were taken into account, set out by the stage of plan preparation.

Scoping Report stage

- 4.5 Following consultation, the sections were amended as follows:
- Baseline data reviewed
 - Sustainability Appraisal indicators revised

Draft stage

- 4.6 No changes to the SA resulted from any of the consultation comments submitted at draft stage, however comments were considered in subsequent assessments.

Revised draft stage

4.7 No consultation comments were submitted directly on the SA at revised draft stage.

Submission JAAP and subsequent modifications

4.8 No representations on the SA were received at the Submission JAAP stage or subsequent consultation on the Proposed Modifications post the Examination in Public.

4.9 All comments were also made publically available in the relevant Consultation Statements.

5 The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with

5.1 As already described, the JAAP was prepared in an iterative way with the SA, as well as other evidence and background studies informing plan production at each stage. The JAAP has strong links to both the Adur Local Plan and Brighton & Hove City Plan Part 1, and many options for development at Shoreham Harbour were considered as part of their preparation. This is set out in [Appendix C of the SA Addendum](#) (January, 2019). At various stages of plan production there was ongoing scrutiny of policies which ensured the assessment was placed within the current context; this is of particular importance when the planning framework changes over time. The adopted plan is considered to reflect the most sustainable approach to future development in the city that is in accordance with national policy requirements, when compared to other alternatives.

Options for growth

5.2 A number of broad options for growth were initially identified for the area by SEEDA and the South East Plan between 2006 and 2009. These were refined through work on the JAAP Development Briefs and capacity and viability work undertaken between 2010-2012 and forms part of the evidence base for the JAAP. Work being carried out as part of Adur Local Plan and Brighton & Hove City Plan at the time also assessed options for growth for the Shoreham Harbour area, which fed into the development of the JAAP, with both identifying Shoreham Harbour as a broad location for development.

Policies

5.3 The capacity and viability work helped to shape the quantum anticipated to be delivered in some of the Character Areas which fed into the Development Briefs developed for the Western Harbour Arm, and Aldrington Basin and South Portslade Industrial Area, which were areas identified as “areas of change”. The Development

Briefs included consideration of options for each area. Recommendations made by the SA of the Development Briefs were subsequently incorporated into the draft JAAP policies.

- 5.4 As the draft and preferred policy approaches within the JAAP progressed throughout the plan production stages, they were refined as appropriate, taking into account emerging and revised national policy, consultation feedback, any new technical evidence and the sustainability appraisal findings.

Conclusions of the Sustainability Appraisal

- 5.5 Overall, the JAAP is considered to reflect the most sustainable approach within the current policy context, providing a balance between social, economic and environmental needs. Although implementation of the JAAP may result in some adverse impacts, some of these impacts would also arise without implementation of the JAAP and would potentially be more significant. However, without the JAAP, less of the beneficial gains would be realised for example, the no plan scenario is considered to have potential to result in:

- 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
- no improvements to flood defences
- no improvements to existing community resources
- worsening of air quality, noise issues and congestion
- no improvement to streetscape, public realm and general appearance of the area

- 5.6 Some of the positive impacts of the JAAP are considered to be:

- 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 of 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

5.7 Some of the adverse impacts of the JAAP are considered to be:

- Potential for an overall increase in energy consumption resulting from increased population
- Potential for an overall increase in 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
- Potential for an overall increase in waste generation resulting from increased population

6 The measures that are to be taken to monitor the effects of the implementation of the plan

6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that local authorities *“monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”*

6.2 The JAAP includes a monitoring framework which identifies a clear method for managing and monitoring implementation of the Plan. This framework is set out in a [Monitoring and Implementation Framework](#). The monitoring framework is set out by Strategic Objective, and includes all policies of relevance to achieving the strategic objective. The framework sets out a target, indicator, triggers and actions to show

what will be done if targets are not achieved. The indicators developed for each strategic objective will ensure that key issues are addressed and more broadly will enable progress in plan delivery to be evaluated.

- 6.3 The Monitoring and Implementation Framework also includes the relevant SA objectives which are of relevance to each indicator. This helps to ensure that monitoring also includes wider sustainability achievements across a range of issues.