



# SHOREHAM HARBOUR REGENERATION

PROPOSED MAIN MODIFICATIONS TO THE  
SHOREHAM HARBOUR JOINT AREA ACTION PLAN  
JANUARY 2019



PUBLISHED FOR CONSULTATION 11 JANUARY 2019—22 FEBRUARY 2019

## 1. Proposed Main Modifications proposed to the Submission Shoreham Harbour Joint Area Action Plan

The schedule below sets out proposed Main Modifications to the Proposed Submission Shoreham Harbour Joint Area Action Plan.

Please also note that Minor Modifications have also been published. Minor modifications are generally regarded as textual and grammar corrections, rephrasing or limited new text to add clarity, or updates to figures or references which are necessary due to alterations which have been made elsewhere.

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold 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 <i>Proposed Submission Shoreham Harbour Joint Area Action Plan</i> (2017) unless otherwise stated).	Sustainability appraisal screening
01	1.1.3	Pre-Hearing	The plan builds on and complements the Adur Local Plan (2017) and the Brighton & Hove City Plan Part One (2016). Planning applications within the regeneration area must comply with the strategy and policies in the JAAP, as well as the relevant local plans, <b><u>unless material considerations indicate otherwise.</u></b>	To be consistent with national policy, the proposed amendment addresses compliance with section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. Proposed in response to Inspector's Question 6.	Not within policy. This amendment has no implications on the SA assessment.
02	2.1 Vision – 2 <sup>nd</sup> paragraph	Submission	The redevelopment of key areas of the harbour will provide benefits for the local community, <b><u>natural environment</u></b> 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 be justified, and consistent with national policy, the proposed amendment reflects in the vision the approach to natural capital taken in the Plan.  Proposed in response to Representation: 2017-1002 (Sussex Wildlife Trust).	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. This amendment has no implications on the SA assessment.
03	2.2.19	Submission/ Pre-Hearing	Local planning authorities should plan for recreational and leisure facilities and services to meet the needs of <b><u>existing communities and</u></b> new development. Planning plays an important role in promoting healthy and active lifestyles. This includes the provision of open space, sports and recreation facilities.	To be positively prepared and effective, the proposed amendment makes clear that the needs of existing communities should also be considered.  Proposed in response to Representation 2017-1510b (Shoreham Rowing Club).	Not within policy. This amendment has no implications on the SA assessment.
04	Policy SH1 (4 – 7) and 3.1.14 – 3.1.20	Submission/ Pre-Hearing/ Post-Hearing	Policy SH1: Climate change, energy and sustainable building  4. Developers should demonstrate how they can contribute <b><u>towards the regeneration partnership's Shoreham Port Authority's</u></b> objective of becoming a hub for renewable energy generation.  5. <b><u>The councils will support proposals for low and zero carbon energy generation, including solar photovoltaics. All new development will be expected to incorporate low and zero carbon decentralised energy opportunities</u></b>  <b><u>Decentralised energy, District heating and cooling networks</u></b>  6. <b><u>All new development will be expected to incorporate low and zero carbon decentralised energy generation, including heating and cooling. The councils will support the development of heating and cooling networks and</u></b>	For clarity, Clause 4 is amended to reflect that this is a shared objective of all regeneration partners.  To be positively prepared, justified and consistent with national policy, Clause 5 is amended to better reflect 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 energy, Stand-alone Energy Schemes and Renewable Energy of the Adur Local Plan 2017.  Proposed in response to Representation:	The modification to clause 4 will not change how the policy is implemented or what is delivered and has no implications on the SA assessment. The modification to clause 5 is a strong indication that low and zero carbon proposals will be supported, having positive impacts for SA objective 1. New clause 6 is a strong indication that low/zero carbon energy generation, and heating/cooling networks and associated infrastructure will be supported, also having positive impacts for SA objective 1. The clear link to the hierarchy within the supporting text should help to ensure the most

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p><b><u>associated infrastructure. All development proposals must demonstrate that heating and cooling systems have been selected in accordance with the heating and cooling hierarchy as set out in Table 1.</u></b></p> <p>7. Where no heat network is in place, development <b>proposals</b> must <b>be designed to be connection ready, and will be expected to demonstrate that all specifications below have been met: All buildings must adhere to the following technical specifications:</b></p> <ul style="list-style-type: none"> <li>• Buildings must use a centralised communal wet heating system rather than individual gas boilers or electric heating.</li> <li>• Buildings must allow adequate plant room space to allow for connection at a later date. <del>(the exact requirement to be agreed with the councils and their representatives).</del></li> <li>• <b><u>Plant rooms must be situated to consider potential future pipe routes.</u></b> The developer must identify and safeguard a pipe route to allow connection between the building and the highway or identified network route where available.</li> <li>• The developer must not in any other way compromise or prevent the potential connection.</li> </ul> <p><b><u>Shoreham Heat Network</u></b></p> <p><b><u>87.</u></b> Development <b><u>within the proposed Shoreham Heat Network area<sup>1</sup> in areas identified in the Shoreham Harbour Heat Network Study (2016), or subsequent update,</u></b> will be <b><u>required expected</u></b> to connect to district heating networks where they exist, or incorporate the necessary infrastructure for connection to future networks.</p> <p><i>Subsequent policy clauses are renumbered to reflect additional clause.</i></p> <p><i>Consequent modification to supporting text to reflect modification to policy:</i></p> <p><b><u>Heating and cooling networks Potential for district heat network</u></b></p> <p><b><u>3.1.14 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></b></p>	<p>2017-1005 (Sussex Wildlife Trust).</p> <p>New Clause 6, and renumbered Clauses 7 and 8 are amended to make the plan effective by:</p> <ul style="list-style-type: none"> <li>• Explicitly clarifying that development across the regeneration area is expected to apply the heating/cooling hierarchy</li> <li>• Setting out how the councils will consider feasibility and viability in relation to heating and cooling systems. The Whole Plan Viability study was carried out on the assumption that all development will incorporate connection ready heating systems.</li> <li>• Setting out the technical requirements for development to be connection ready.</li> </ul> <p>The modifications respond to issues raised by the Inspector during the Hearings; reflect the findings of the Shoreham Harbour District Energy Feasibility Study (2018); and the current status of the Shoreham Heat Network project.</p> <p>The supporting text has been modified to reflect the policy changes, and updated to reflect the NPPF (2018).</p>	<p>energy efficient measure is implemented.</p> <p>The modifications to clause 7 supplement the previous requirements and should help to ensure that development is connection ready to allow for future connection to heating/cooling networks. The modifications to clause 8 better define the Shoreham Heat Network Area and now requires, rather than expects development in this area to connect to a network where they exist. The amendment from "expected" to "required" is a stronger policy position, impacting positively on SA objective 1.</p> <p>The supporting text clarifies that the proposed Shoreham Heat Network is in the Western Harbour Arm character area. This area should provide the majority of the residential development from within the JAAP area and approximately half the employment floorspace, therefore delivery of district heating/cooling within this area would have greater positive outcomes in relation to protecting against future fuel poverty of residents in particular and may impact positively on SA objective 11. In addition, the study indicates connection to some existing residential development, therefore potentially reducing any fuel poverty associated with these existing buildings.</p> <p>Clauses 6, 7 and 8 support the infrastructure associated with decentralised energy and heating/cooling networks. The supporting text clarifies that marine source heat pumps are proposed to 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 and may adversely impact on SA objective 4.</p> <p>The modifications to the supporting text are</p>

<sup>1</sup> As identified in the Shoreham Harbour District Energy Feasibility Study (2018) or subsequent update.

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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									
			<p>3.1.<del>1514</del> <b><u>In accordance with Policies As set out in Policy DA8 and CP8</u></b> of the Brighton &amp; Hove City Plan Part One, <b><u>and Policies 8 and 19 of the Adur Local Plan</u></b>, the <b><u>city councils are</u></b> <del>is</del> proactively encouraging opportunities that arise to incorporate waste heat or other heat sources into the heat networks for the area. The Brighton &amp; Hove Energy Study (2013) identified the potential for district heating networks in and around Shoreham Harbour within a long list of priority areas.</p> <p>3.1.<del>1615</del> All new development <del>that takes place within the long list of priority areas will be encouraged to consider will be expected to incorporate</del> low and zero carbon decentralised energy <b><u>generation possibilities</u></b> and will be required to either connect where a suitable <b><u>heating/cooling</u></b> network is in place (or would be at the time of construction), or design systems to be compatible with a future connection to a network. All <b><u>development proposals must demonstrate that the heating and cooling systems have been selected in accordance with the heating and cooling hierarchy as set in Table 1:</u></b></p> <p><b><u>Table 1: Heating and cooling hierarchy</u></b></p> <table border="1" data-bbox="528 993 1665 1472"> <thead> <tr> <th data-bbox="528 993 1665 1031"><b><u>System</u></b></th> </tr> </thead> <tbody> <tr> <td data-bbox="528 1066 1665 1104">1. <b><u>Connection to existing heating/cooling network</u></b></td> </tr> <tr> <td data-bbox="528 1104 1665 1142">2. <b><u>Site-wide heating/cooling network</u></b></td> </tr> <tr> <td data-bbox="528 1142 1665 1180">3. <b><u>Building-wide heating/cooling network</u></b></td> </tr> <tr> <td data-bbox="528 1180 1665 1218">4. <b><u>Individual heating/cooling systems</u></b></td> </tr> <tr> <th data-bbox="528 1253 1665 1291"><b><u>Technology</u></b></th> </tr> <tr> <td data-bbox="528 1327 1665 1365">1. <b><u>Renewable/waste energy sources (such as biomass, heat pumps, solar thermal)</u></b></td> </tr> <tr> <td data-bbox="528 1365 1665 1402">2. <b><u>Low carbon technologies (such as gas-CHP)</u></b></td> </tr> <tr> <td data-bbox="528 1402 1665 1440">3. <b><u>Conventional systems (such as gas or direct electric)</u></b></td> </tr> </tbody> </table> <p>3.1.17 <b><u>In order to safeguard future connection to heating/cooling networks, individual heating/cooling systems will not normally be permitted, unless it can be demonstrated that it is not feasible and/or viable to provide a centralised communal wet heating system.</u></b></p> <p>3.1.18 <b><u>The councils will require the submission of a feasibility assessment to provide a rationale for the chosen heating/cooling system This should incorporate a high level assessment of the potential to extend the heating/cooling network beyond the development area in future. Development must adhere to the guidelines set out in Chapter 3 – Design – of the CIBSE Heat Networks Code of Practice for the UK.</u></b></p> <p>3.1.19 <b><u>Within the proposed Shoreham Heat Network Area, buildings must allow</u></b></p>	<b><u>System</u></b>	1. <b><u>Connection to existing heating/cooling network</u></b>	2. <b><u>Site-wide heating/cooling network</u></b>	3. <b><u>Building-wide heating/cooling network</u></b>	4. <b><u>Individual heating/cooling systems</u></b>	<b><u>Technology</u></b>	1. <b><u>Renewable/waste energy sources (such as biomass, heat pumps, solar thermal)</u></b>	2. <b><u>Low carbon technologies (such as gas-CHP)</u></b>	3. <b><u>Conventional systems (such as gas or direct electric)</u></b>		<p>considered to add greater clarity and technical detail which should support the successful implementation of the policy.</p> <p>The modifications to clauses 5, 6, 7 and 8, and associated supporting text, are considered to strengthen the policy for some SA Objectives including objective 1 and objective 11. The scores for these objectives were already positive, and although the modification is considered to strengthen the positive impact, it is not considered to change the previous SA score. However, there is potential for adverse impacts on ecology resulting from the infrastructure relating to marine source heat pumps, impacting upon SA objective 4. This is change from the previous SA and would need re-appraisal.</p> <p>The re-appraisal of this policy is included within the Sustainability Appraisal report that accompanies this schedule.</p>
<b><u>System</u></b>														
1. <b><u>Connection to existing heating/cooling network</u></b>														
2. <b><u>Site-wide heating/cooling network</u></b>														
3. <b><u>Building-wide heating/cooling network</u></b>														
4. <b><u>Individual heating/cooling systems</u></b>														
<b><u>Technology</u></b>														
1. <b><u>Renewable/waste energy sources (such as biomass, heat pumps, solar thermal)</u></b>														
2. <b><u>Low carbon technologies (such as gas-CHP)</u></b>														
3. <b><u>Conventional systems (such as gas or direct electric)</u></b>														

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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															
			<p><b><u>adequate plant room space for future connection and for future building/network interface equipment (such as heat exchangers). Indicative requirements are set out in Table 2:</u></b></p> <p><b><u>Table 2: Indicative space requirements for heat exchange substation equipment within building plant rooms<sup>2</sup></u></b></p> <table border="1" data-bbox="528 590 1662 852"> <thead> <tr> <th><b><u>Heating capacity (kW) (space heating and ventilation)</u></b></th> <th><b><u>Approximate building size (m<sup>3</sup>)</u></b></th> <th><b><u>Space required by the heating equipment (m<sup>2</sup>)</u></b></th> </tr> </thead> <tbody> <tr> <td><b><u>30</u></b></td> <td><b><u>1,000 – 1,500</u></b></td> <td><b><u>2</u></b></td> </tr> <tr> <td><b><u>200</u></b></td> <td><b><u>10,000 – 15,000</u></b></td> <td><b><u>4</u></b></td> </tr> <tr> <td><b><u>400</u></b></td> <td><b><u>20,000 – 30,000</u></b></td> <td><b><u>5</u></b></td> </tr> <tr> <td><b><u>800</u></b></td> <td><b><u>40,000 – 60,000</u></b></td> <td><b><u>6</u></b></td> </tr> </tbody> </table> <p><b><u>3.1.20 Heat in buildings must operate at an appropriate temperature for future connection to a heat network. The targeted difference between flow and return temperatures on the primary heat network shall be no greater than 30°C for supply to new buildings.</u></b></p> <p><b><u>3.1.21 Plant rooms must be situated to consider potential future pipe routes. Pipe runs from the plant room to the highway or proposed heat network main route must be protected and remain accessible for future installation.</u></b></p> <p><b><u>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</u></b></p> <p><b><u>3.1.2217 In the event that a developer considers compliance with the heating/cooling hierarchy to be unviable, proposals should be submitted with a viability assessment, to justify departure from the hierarchy. Viability assessments must:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Be compliant with the CIBSE Heat Networks Code of Practice for the UK</u></b></li> <li>• <b><u>Be completed by a suitably qualified individual<sup>3</sup></u></b></li> <li>• <b><u>Include baseline energy consumption and carbon emissions calculations for regulated and non-regulated energy use</u></b></li> <li>• <b><u>Compare the economies of a heat network solution<sup>4</sup> against individual heating scenario<sup>5</sup></u></b></li> </ul>	<b><u>Heating capacity (kW) (space heating and ventilation)</u></b>	<b><u>Approximate building size (m<sup>3</sup>)</u></b>	<b><u>Space required by the heating equipment (m<sup>2</sup>)</u></b>	<b><u>30</u></b>	<b><u>1,000 – 1,500</u></b>	<b><u>2</u></b>	<b><u>200</u></b>	<b><u>10,000 – 15,000</u></b>	<b><u>4</u></b>	<b><u>400</u></b>	<b><u>20,000 – 30,000</u></b>	<b><u>5</u></b>	<b><u>800</u></b>	<b><u>40,000 – 60,000</u></b>	<b><u>6</u></b>		
<b><u>Heating capacity (kW) (space heating and ventilation)</u></b>	<b><u>Approximate building size (m<sup>3</sup>)</u></b>	<b><u>Space required by the heating equipment (m<sup>2</sup>)</u></b>																		
<b><u>30</u></b>	<b><u>1,000 – 1,500</u></b>	<b><u>2</u></b>																		
<b><u>200</u></b>	<b><u>10,000 – 15,000</u></b>	<b><u>4</u></b>																		
<b><u>400</u></b>	<b><u>20,000 – 30,000</u></b>	<b><u>5</u></b>																		
<b><u>800</u></b>	<b><u>40,000 – 60,000</u></b>	<b><u>6</u></b>																		

<sup>3</sup> For example a CIBSE Heat Network Code of Practice Qualified Consultant

<sup>4</sup> This includes the cost of a communal boiler system, heat meters, heat interface units and plate heat exchanger.

<sup>5</sup> Such as individual gas boilers alongside an equivalent level of microrenewables that would be required to meet energy efficiency requirements.

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<ul style="list-style-type: none"> <li>• <b><u>Provide a breakdown of the cost estimates and assumptions used for the assessment</u></b></li> <li>• <b><u>Include linear heat density calculations for the site</u></b></li> <li>• <b><u>Present Internal Rate of Return (IRR), capital expenditure, cost and carbon savings as outputs.</u></b></li> </ul> <p><b><u>Shoreham Heat Network</u></b></p> <p><b><u>3.1.23 Shoreham Harbour Regeneration Partnership, Adur District Council, West Sussex County Council and Shoreham Port Authority have formed the Shoreham Heat Network Partnership.</u></b> The Heat Network Delivery Unit (HNDU) has provided part funding to explore the potential for heat 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. <b><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></b></p> <p><b><u>3.1.24 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 environmental permits.</u></b></p> <p><b><u>3.1.2518 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></b></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 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><b><u>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></b></p> <ul style="list-style-type: none"> <li>• <del>Connection to existing combined heat and power (CHP) distribution networks</del></li> </ul>		

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<ul style="list-style-type: none"> <li>• <del>Site wide renewable CHP</del></li> <li>• <del>Site wide gas-fired CHP</del></li> <li>• <del>Site wide renewable community heating/cooling</del></li> <li>• <del>Site wide gas-fired community heating/cooling</del></li> <li>• <del>Individual building renewable heating</del></li> <li>• <del>Individual building heating, with the exception of electric heating</del></li> </ul> <p><del>3.1.20 All CHP must be of a scale and operated to maximise the potential for carbon reduction. All buildings must adhere to the guidelines set out in Chapter 3 – Design – of the CIBSE Heat Networks Code of Practice for the UK.</del></p>		
05	3.3.4	Hearing	<p><b>3.3.6</b> <u>Some existing employment areas are protected within the relevant character area policies. The councils will monitor conversions of employment space to residential development through the monitoring framework set out in the Appendix. If necessary, in response to the identified monitoring indicator trigger, the councils will consider seeking to remove permitted development rights in accordance with Article 4 of The Town and Country Planning (General Permitted Development) (England) Order 2015.</u></p>	<p>To be positively prepared and effective, the proposed new paragraph would specifically identify a robust monitoring mechanism for the use of land within the identified protected employment areas, including the potential for identified intervention, if required.</p> <p>Proposed in response to an issue raised by the Inspector during the Hearings.</p>	<p>This new paragraph forms supporting text to policy SH3 Economy and Employment. It indicates that the councils will monitor conversions from land in B class uses to C3 uses and that an Article 4 Direction(s) may be implemented to remove permitted development rights if monitoring suggests it is needed. If implemented, this could help to ensure land/sites remain in employment use, and would strengthen the policy in relation to SA Objective 17. The score for this objective is already positive, and although the modification is considered to strengthen the positive impact, it does not change the previous SA score for this objective. Implementation of an Article 4 Direction could prevent C3 from coming forward from conversions. It is unknown what impact this would have on housing delivery, as monitoring figures on the number of units being brought forward from conversions within the JAAP area is not currently available. An unknown impact is different from the previous SA findings, of a neutral impact and therefore requires re-appraisal.</p> <p>The re-appraisal of this policy is included within the Sustainability Appraisal report that accompanies this schedule.</p>
06	2.2 Objective 4: Housing and community	Pre-Hearing	<p>To <b>contribute to meeting the housing needs of Adur and Brighton &amp; Hove address shortfalls in local housing provision</b> through delivering new homes of a range of sizes, tenures and types, including affordable and family homes as well as associated supporting community infrastructure.</p>	<p>To be positively prepared and justified, it is necessary to clarify that the JAAP contributes to meeting housing needs rather than addressing shortfalls in housing provision.</p> <p>Proposed in response to Inspector's</p>	<p>This paragraph forms part of Objective 4: Housing and Community. The objectives were assessed against the SA framework in the Proposed Submission SA (Nov 2017). The modification is considered to provide greater clarity, but does not change the overall meaning of the objective.</p>

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
				question 31.	No change to SA scores against the SA Framework for Objective 4 in relation to this modification.
07	3.6.6 – 3.6.7	Hearing	<p>3.6.6 The NPPF highlights the need to direct development away from areas at highest risk of flooding<sup>6</sup>. <b>Development Plans should apply a sequential, risk-based approach to the location of development to minimise risk from flooding and take account of the impacts of climate change. The proposals in this plan have been assessed through the Sequential and Exceptions Tests carried out in preparation of the Brighton &amp; Hove City Plan Part One (2016) and the Adur Local Plan (2017). Therefore, a sequential test will not be required for proposed development within the allocations, unless the proposal departs significantly from the terms of the allocation. (thereby avoiding the risk in the first instance), but where development is necessary, ensuring it will be safe without increasing the risk of flooding elsewhere.</b></p> <p><b>3.6.7 Proposed development outside the allocations in this plan and within flood zone 2 or 3 will require a sequential test to be carried out as part of the site-specific flood risk assessment<sup>7</sup>. To support the regeneration of the area, applicants will be expected to search for alternative sites at a lower risk of flooding within the character area the site is situated in (as identified in this plan). Where necessary, having regard to the potential vulnerability of the site and the development proposed, an exceptions test will also be required.</b></p> <p><del>3.6.8</del> <b>Refer to p</b> Policies in Part 4 3 of this plan <b>which</b> 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. <b>Responsibility for the delivery and maintenance of flood defences will belong to the landowner.</b></p>	<p>To be effective, justified, positively prepared and consistent with national policy, it is necessary to clarify the requirement for sequential test in relation to windfall sites, in particular the search area for alternative sites; and to clarify that the landowner is responsible for provision and maintenance of flood defences.</p> <p>Proposed to address issues raised by the Inspector during the Hearings.</p>	<p>These modifications to supporting text are within policy SH6 Flood risk and sustainable drainage. The modifications provide additional clarity with regards to flood risk assessment requirements for windfall sites and the requirements placed on applicants and landowners, as well as clarify requirements where proposals detract from the uses specified within the Character Areas.</p> <p>The modifications are considered to strengthen the policy in relation to SA objective 10 and objective 18. The scores for these objectives are already positive, and although the modification is considered to strengthen the positive impact, it does not change the previous SA score.</p> <p>No change to SA scores against the relevant SA Objectives for policy SH6 in relation to these modifications.</p>
8	Policy SH6 (1)	Submission	<p>1. <b>The partnership will support the delivery of measures to mitigate flood risk and coastal erosion in the regeneration area.</b> 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 <b>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. Where development creates new or alters flood flow routes, the site specific Flood Risk Assessment must assess the potential flood hazard posed by them to ensure that flood risk is not increased elsewhere.</b></p>	<p>To be effective, justified, positively prepared and consistent with national policy, the proposed amendment makes reference to supporting mitigation measures; allows for an update to the Flood Risk Management Guide; and makes clear that any subsequent evidence and policy will be taken into account.</p> <p>The amendment also corrects a drafting error whereby clause 3 of Policy SH6 was replicated at the end of clause 1.</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 policy and have positive impacts for the SA objectives 10 and 18. Both scores for these objectives are already positive,</p>

<sup>6</sup> Paragraph 158, NPPF (2018)

<sup>7</sup> Subject to the criteria in the PPG

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
				Proposed in response to Representation: 2017-1204 (Hopegar Properties Ltd) and Late Representation: 2017-2001 (Environment Agency).	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. No change to SA assessment for SH6 in relation to these modifications.
9		Pre-Hearing	<p>6. Where undefended land levels are below the 1 in 200-year tidal flood event for 2115, <del>land raising and/or</del> flood defences should be provided to 5.4m AOD. For sites where existing defences / land levels do not meet the heights outlined above, developers will be required to deliver flood defences <del>or land raising</del> to this height to meet the required standard of protection.</p> <p><i>Consequent modification to supporting text:</i></p> <p>4.7.18 Comprehensive <del>land raising and/or</del> flood defence provision will be essential to protect existing and future residents and businesses as well as the A259. This approach, which focuses on flood defence provision from the Adur Ferry Bridge to Kingston Beach, will ensure the complete closure of the flood cell and continuation of the line of new defences currently being provided via the Shoreham Adur Tidal Walls Scheme an Environment Agency funded flood defence scheme which ends at the Adur Ferry Bridge.</p>	<p>To be justified and consistent with national policy, the amendment removes reference to land raising.</p> <p>Proposed in response to concerns from Lead Local Flood Authority during preparation of Councils' Matters Statements.</p>	<p>The modification to clause 6 of SH6 and the supporting text to CA7 deletes the text relating to land-raising. It is understood that land-raising is one of many measures that could be implemented to reduce flood risk. It is also understood that this reference to land-raising was inferring to the floor level required for new development to exceed, rather than creating a new landform.</p> <p>Deletion of this specific text is not considered to have any impact on SA objective 10 or SA objective 18 as this clause still refers to ensuring flood defences are delivered.</p> <p>No change to SA assessment for SH6 or CA7 in relation to these modifications.</p>
10	Policy SH6 (15) (12)	Pre-Hearing	<p><del>12 15</del> Proposals which seek to provide basement parking in tidal/fluvial flood zones will only be acceptable where adequate mitigation and emergency planning are included as part of the planning application. <b><u>Developers will be required to demonstrate that drainage and separators will not release potential contaminants to the environment.</u></b></p>	<p>To be effective and consistent with national policy, the proposed amendment reduces the risk of pollution to water. Proposed in response to concerns from the Lead Local Flood Authority during preparation of the Councils' Matters Statements.</p> <p>The numbering of this clause is amended by Additional Modification 52.</p>	<p>This addition modification to policy SH6 should ensure that the risk of pollution to water from potential contaminants associated with basement parking is reduced.</p> <p>This modification is considered to strengthen the policy and would have positive impacts for SA objective 4 and SA objective 9. The scores for these objectives are already positive, and although the modification strengthens the positive impact, it does not change the previous SA score for these relevant objectives for this policy.</p> <p>No change to SA assessment for SH6 in relation to this modification.</p>
11	Policy SH7 (4) and (7)	Submission/ Pre-Hearing/ Hearing	<p>4. All development <b><u>applications</u></b> must <b><u>be accompanied up to date ecological information to</u></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</p>	<p>To be justified and consistent with national policy, it is necessary to clarify the requirement for ecological information; and the councils approach to mitigation hierarchy and compensatory habitats at River Adur.</p>	<p>The modification to clause 4, and supplementary supporting text, clarifies that ecological information must be submitted with applications.</p> <p>The modification to clause 7 provides further clarification as to where compensatory habitat should be provided where necessary.</p>

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p>its delivery and maintenance.</p> <p><i>Clauses 5 and 6 are unchanged.</i></p> <p>7. Where impacts on biodiversity cannot be avoided or mitigated, compensatory <b>actions measures</b> will be required, taking account of an up-to-date ecological survey. <b><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></b></p> <p><i>Consequent changes to supporting text:</i></p> <p>3.7.2 New development within the <b><u>regeneration area harbour</u></b> is expected to be outstanding from an environmental perspective and all opportunities to promote biodiversity need to be considered. <b><u>The councils will require the submission of an Ecological Impact Assessment carried out in accordance with British Standards (BS42020:2013 Biodiversity – Code of practice for planning and development) and CIEEM guidance, or subsequent updates. Ecological impacts should be assessed and recommendations for appropriate mitigation, compensation and enhancement made. Negative impacts should be avoided wherever possible.</u></b> It is possible to significantly reduce negative impacts of development on the ecology of an area through mitigation measures. Any potential wildlife habitats that will be lost or negatively impacted as a result of development will need to be compensated for and enhanced wherever possible.</p> <p><b><u>3.7.3 There is potential for development at the Western Harbour Arm to lead to loss of, or harmful impact to, intertidal habitats in the River Adur. Adur District Council is currently working with partners including Sussex Wildlife Trust and the Environment Agency to develop a strategy to address this issue, and identify suitable locations for compensatory habitat creation. Nevertheless, developers will be required to demonstrate that impacts cannot be avoided before mitigation and/or compensatory measures are considered.</u></b></p> <p><i>Renumber subsequent paragraphs</i></p>	<p>Proposed in response to Representation: 2017-1007 (Sussex Wildlife Trust) and late Representation: 2017-2003 (Environment Agency).</p>	<p>These modifications are considered to strengthen the policy, and have positive impacts for SA objective 4. The score for this objective was already positive and although this modification strengthens the positive impact, it is not considered to change the previous score.</p> <p>The modifications to supporting text paragraph 3.7.3 highlight that there is potential for adverse ecological impact resulting from development within the Western Harbour Arm. The actual impact of this is more appropriately considered under the policy appraisal for CA7, and therefore this modification is not considered to have any impacts upon the relevant SA objective for policy SH7, particularly as SH7 is predominantly concerned with protection of the natural environment. In addition, this modification still seeks to avoid negative impacts rather than mitigating/compensating.</p> <p>No change to SA assessment for SH7 in relation to these modifications.</p>
12	Policy SH7 (13)	Pre - Hearing	<p>Air quality impacts should be considered at an early stage in the design process to ensure that creating new exposure to poor air quality is avoided. <b><u>Development proposals must be accompanied by an assessment of the air quality impacts for existing and future occupants. This assessment must have regard to the cumulative impacts of committed and planned development on air quality.</u></b></p>	<p>For consistency with national policy and to ensure that the plan is effective in addressing air quality impacts, including cumulative impacts, of new development.</p>	<p>The modification to clause 13 clarifies that an air quality assessment, including an assessment of cumulative impacts must be submitted with applications.</p>

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
				Proposed in response to Inspector's question 22.	This modification is considered to strengthen the policy and has positive impacts for SA objective 7: Reduce the risk of air pollution". The score for this objective was already positive and although this modification strengthens the positive impact, it is not considered to change the previous score.  No change to SA assessment for SH7 in relation to this modification.
13	Policy SH8 (1)	Pre-Hearing	<b>New</b> development <b>proposals</b> will be required to <b>contribute to the provision of provide high quality, multifunctional public open space / green infrastructure to meet the needs it generates</b> onsite. The type and quantity of open space will be determined by the scale and type of development, <b>having regard to</b> the identified needs <b>of the area</b> , local standards and the <i>Shoreham Harbour Green Infrastructure Strategy</i> . <b>Development will be expected to optimise the amount of onsite provision. Where it is not possible to meet all or part of the open space requirements on site, subject to agreement of the council(s), an appropriate alternative provision, such as enhanced public realm, and/or contribution towards off site provision will be required.</b>	To ensure that the policy is effective and remove potential conflict with CA2(10), CA3(12) and CA7(15).  Proposed in response to Inspector's question 45.	The modifications to clause 1 clarify that any open space provided should be in relation to the need generated by development. The modification prioritises on-site provision however allows for off-site provision/contributions.  These modifications are considered to clarify the approach and is considered to have positive impacts for various objectives including objective 4 "biodiversity"; 5 "local distinctiveness; 6 "open space"; 11 "health" and 20 "place-making". However, the scores for all these objectives are already positive and therefore these modifications are not considered to change the previous score.  No change to SA assessment for SH8 in relation to this modification.
14	Policy SH9 (3-5)	Pre-Hearing/ Post-Hearing	<p>3. Development proposals should improve the quality, accessibility, security and legibility of public streets and spaces. The public realm elements of the development proposals must be designed in accordance with the Shoreham Harbour Streetscape Guide (2012). <b>The design of spaces between and around buildings must consider all of the following key design aspects:</b></p> <ul style="list-style-type: none"> <li>• <b>purpose and function</b></li> <li>• <b>access and linkages</b></li> <li>• <b>uses and activities</b></li> <li>• <b>comfort, image and sociability.</b></li> </ul> <p>4. Having regard to the indicative opportunities for public art identified within Map 4, <b>major development will be expected to incorporate an integral public art element(s) contribution will be sought for the provision of public art</b>, in accordance with the scale of development proposed <b>and in agreement with the council.</b></p> <p>5. All development <b>will be expected to embrace principles of good urban design with reference to the following characteristics proposals must demonstrate a high standard of design that enhances the visual quality of the environment and</b></p>	To be effective and consistent with national policy, clause 3 is modified to highlight key design aspects relating to the public realm elements of design proposals. This reflects the requirements in paragraphs 57 and 58 of the NPPF (2012) to <ul style="list-style-type: none"> <li>• plan positively for high quality and inclusive design</li> <li>• to include in local plans robust and comprehensive policies that set out the quality of development that will be expected. This includes: <ul style="list-style-type: none"> <li>• establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;</li> <li>• optimise the potential of the site to accommodate development, create</li> </ul> </li> </ul>	The modifications to clause 3 add clarity and sets clear design considerations for applicants. This is considered to strengthen the policy and has positive impacts for various SA objectives including 5; 6; 11; and 20. The scores for these objectives were already positive and although this modification strengthens the positive impact, it is not considered to change the previous score.  The modifications to clause 4 are considered to deliver be a stronger policy position than the previous iteration as now development is expected to incorporate a public art element, rather than provide a contribution. This would result in a positive impact for objectives 5 and 20. However, the scores for all these objectives are already positive and therefore these modifications are not considered to change the previous score.

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p><b><u>makes a positive contribution to creating places that are safe, inclusive and accessible; and which promote health and wellbeing. In particular, proposals for development will be expected to consider all of the following key design aspects:</u></b></p> <ul style="list-style-type: none"> <li>• High <del>standards of quality building materials</del>, architectural design and detailing.</li> <li>• Suitable scale and massing in relation to housing type and local context, including <b><u>landscape</u></b>, townscape character and historic environment.</li> <li>• Appropriate internal <del>and external</del> space standards in accordance with the nationally described space standards.</li> <li>• Buildings should provide strong enclosure to public spaces and streets, and should maintain a clear distinction between public, semi-private and private space.</li> <li>• <del>High standards of private amenity space for all residential development, including private balconies, terraces, gardens and shared courtyards as appropriate</del></li> <li>• <del>Careful consideration of the impact of new development on access to daylight and sunlight for both existing and new residents.</del></li> </ul> <p><b><u>6. All new residential development will be required to provide useable private outdoor amenity space appropriate to the scale and character of the development.</u></b></p> <p><b><u>7. Development proposals must demonstrate that the effects of the development on the amenity of proposed future and existing users, residents and occupiers would not be unacceptable. When designing new development, applicants will be required to consider the effect of their proposal upon all of the following:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>visual privacy and overlooking</u></b></li> <li>• <b><u>outlook</u></b></li> <li>• <b><u>overshadowing</u></b></li> <li>• <b><u>sunlight and daylight</u></b></li> <li>• <b><u>artificial lighting</u></b></li> <li>• <b><u>disturbance from noise, odour, vibration, air pollution.</u></b></li> </ul> <p><i>Consequent change to supporting text (new paragraphs):</i></p> <p><b><u>Public realm</u></b></p> <p><b><u>3.9.4 Buildings within a development should be arranged to create well defined spaces, each with a clear purpose and function. The spaces within a development should not consist simply of the land left over once the footprints of buildings and the positions of roads and accesses have been established. Defining the nature and use of the spaces early in the design process can help inform the siting and design of buildings, hard and soft landscape and, if applicable, distribution of uses that will enclose these spaces.</u></b></p> <p><b><u>3.9.5 A successful place is easy to get to, visible and easy to move through. Physical elements can enhance access and links and add interest and help create a safer</u></b></p>	<p>and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;</p> <ul style="list-style-type: none"> <li>• create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;</li> </ul> <p>Suggested in response to Inspector's question 10, and discussion at hearings.</p> <p>To be effective and consistent with ALP, B&amp;HCP(1) and CIL Regulations, clause 4 is modified to clarify that the councils expect public art to be delivered on site, rather than to collect contributions for offsite provision.</p> <p>Modification proposed in response to Inspector's question 52.</p> <p>Place making and design quality are integral to the objectives of the Plan and to the NPPF. New text is required to support and justify this approach.</p> <p>To be effective and consistent with national policy, clause 5 is modified to ensure that the plan adequately reflects the requirement for high quality, accessible and inclusive design. This reflects the requirements of paragraphs 57,58, 61 and 69 of the NPPF (2012) to:</p> <ul style="list-style-type: none"> <li>• plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes;</li> <li>• to include in local plans robust and comprehensive policies that set out the quality of development that will be expected. This includes: <ul style="list-style-type: none"> <li>• establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable</li> </ul> </li> </ul>	<p>The modifications to clause 5 are considered to strengthen the existing policy requirements in relation to various SA objectives including objective 5; 11; and 20. The modification also introduces new requirements relating to accessibility and inclusivity. This is considered to have positive impacts for SA objective 14 and objective 19. This is a change from the previous SA assessment and will require re-appraisal.</p> <p>The new clauses 6 and 7 provide further details and largely replace text that has been deleted from previous clause (5). The additional amenity considerations under clause 7 are considered to strengthen the policy against SA objective 11, which is already positive.</p> <p>The subsequent modifications to supporting text are considered to supplement the policy and strengthen the SA assessment against various objectives, including SA objective 5; 6; 11; 12; 15; 16; 20,, and also further support the change to the previous SA assessment against objectives 14, and 19, as described above.</p> <p>The re-appraisal of this policy is included within the Sustainability Appraisal report that accompanies this schedule.</p>

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p><u>environment. The ability to see a public space from a distance, parking arrangements and convenient public transport can also contribute to better access.</u></p> <p><b>3.9.6 Successful public places typically offer a variety of uses and activities in and/or around it that suits its users. The right mix and spatial clustering of uses can be critical to attracting a range of people and animating a space. All new development should present an interesting and attractive frontage particularly at street level for pedestrians.</b></p> <p><b>3.9.7 A successful place can encourage all sorts of people to meet and interact, creating a stronger attachment to their community and to the sense of place that fosters these types of social activities. In general, comfort and sociability relate to people’s sense of safety, cleanliness and overall character of a place. The presence and quality of hard and soft landscaping and the nature of vehicular traffic will also influence these perceptions. Substantial traffic and associated perceptions about danger, noise and air quality may make movement through spaces difficult and deter people from lingering in them.</b></p> <p><b>Public art</b></p> <p><b>3.9.8 Public art can play an important role in creating and enhancing local distinctiveness. It provides an opportunity to involve local communities in place making, and to offer work opportunities to artists, including from the local area. Where appropriate, the partnership and councils will expect to be involved in the selection process. Public art can include architectural details, public realm elements, landscaping schemes, sculpture, water features, street furniture and lighting effects. It should be directly related to its setting, and therefore be an integral element of a proposal.</b></p> <p><b>Design principles</b></p> <p><b>3.9.9 Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible, and promote health and well-being<sup>8</sup>. Good design is critical to ensuring development functions well, is visually attractive, and is sympathetic to local character, in order to create attractive, welcoming and distinctive places to live, work and visit<sup>9</sup>.</b></p> <p><b>3.9.10 The selection of external materials and finishes is often a critical factor in determining how well a new development relates visually to its surroundings. By adopting the local palette of materials, and the ways in which these are combined and detailed, new development can reinforce local distinctiveness.</b></p> <p><b>3.9.11 Scale and massing of buildings is a major factor in determining the visual</b></p>	<p>places to live, work and visit;</p> <ul style="list-style-type: none"> <li>• respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;</li> <li>• create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion;</li> <li>• are visually attractive as a result of good architecture and appropriate landscaping.</li> </ul> <ul style="list-style-type: none"> <li>• to address the connections between people and places and the integration of new development into the natural, built and historic environment.</li> <li>• To facilitate social interaction and create healthy, inclusive communities.</li> </ul> <p>Suggested in response to Inspector’s question 10, and discussion at hearings.</p> <p>The final two bullet points of clause 5 have been removed, and replaced as clauses in their own right.</p> <p>In order to be effective and consistent with national policy, clause 6 clarifies that the policy seeks provision of appropriate external amenity space, rather than specifying a particular standard. Modification proposed in response to Inspector’s question 20, and discussion at the Hearings.</p> <p>In order to be effective and consistent with national policy, clause 7 clarifies that factors that will be considered in assessing the impacts of development on the</p>	

<sup>8</sup> Paragraph 127 NPPF (2018)

<sup>9</sup> Paragraph 127 NPPF (2018)

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p><b><u>character of an area. The aim should be to create a sense of harmony and visual continuity between new and old. Elements of any building that are visible from a highway are of particular importance.</u></b></p> <p><b><u>3.9.12 Internal and external space standards and layout are an important aspect of good quality homes. The councils will expect development proposals to meet the nationally described space standards, which cover minimum gross internal floor, ceiling heights and storage space requirements.</u></b></p> <p><b><u>Outside space</u></b></p> <p><b><u>3.9.13 An element of useable private outdoor amenity space should be provided for the occupants of new residential development. Private amenity space can make an important contribution in improving the health, well-being and general quality of life of the area's residents and has the potential to support and enhance local biodiversity. The provision of space for seating, play, drying and storage space is part of securing good design and a good standard of residential development in the regeneration area.</u></b></p> <p><b><u>3.9.14 Appropriate forms of provision include gardens, balconies, patios, roof terraces and shared amenity spaces in flatted forms of development. Factors such as access to the amenity space, its orientation, scope for privacy, size and usability will be key considerations.</u></b></p> <p><b><u>Amenity</u></b></p> <p><b><u>3.9.15 As development at Shoreham Harbour is expected to be high density, proposals for new development need to consider their impact upon neighbours as well as future users, residents and occupiers. Most potential negative impact can be addressed through design and mitigation measures if these are considered early in the design stage of a development.</u></b></p> <p><b><u>3.9.16 New buildings should be carefully designed to avoid overlooking. The most sensitive areas are: living rooms; bedrooms; kitchens. Public spaces and communal areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.</u></b></p> <p><b><u>3.9.17 Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. New development should ensure the proximity, size or cumulative effect of any structures do not have an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers. Particular care should be given to development that adjoins properties with a single aspect.</u></b></p> <p><b><u>3.9.18 New development should take reasonable steps to avoid overshadowing windows to habitable rooms or open spaces and gardens. This may be particularly difficult in the denser areas of the area. However, it is important in</u></b></p>	<p>amenity of proposed future and existing users.</p> <p>Modification proposed in response to Inspector's question 15, and discussion at the hearings.</p>	

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p><b><u>these areas to prevent overshadowing of amenity space and open spaces given the limited amount of open spaces and the existing amount of overshadowing.</u></b></p> <p><b><u>3.9.19 Sunlight and daylight will be affected by the location of the proposed development and its proximity to, and position in relation to, nearby windows. The councils will assess whether acceptable levels of daylight and sunlight are available to habitable spaces. Reports will be required for both minor and major applications where a proposal has the potential to materially reduce daylight and sunlight levels.</u></b></p> <p><i>Subsequent paragraphs renumbered</i></p>		
15	Policy CA3 (4)(f)	Pre-Hearing	SP6 – Church Road/Wellington Road/ St Peter’s Road: The southern portion of the site is allocated for new employment development (use classes B1, B2 and <del>B3</del> ). Employment uses must be compatible with adjacent residential development. As part of a comprehensive redevelopment, residential development is acceptable on the northern portion of the site, fronting onto St Peter’s Road.	To correct a typographic error, for effectiveness.	This modification corrects a typo. The SA assessment considered the delivery of all types of employment floorspace, and did not distinguish between different types.  This amendment is not considered to have any implications on the SA assessment for policy CA3.
16	Policy CA4 (2)	Submission/ Pre-Hearing	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.	For effectiveness. The modification clarifies the partnership’s commitment to delivering enhancements to coastal vegetated shingle habitats Suggested to address an issue raised in Representation: 2017-1011 (Sussex Wildlife Trust).	Further strengthens the SA assessment against SA objective 4. However this score is already positive and therefore this modification does not change the SA score.  No SA implications.
17	4.6.1 – 4.6.4	Pre-Submission	<p>Area Priorities</p> <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><b>To support the delivery of the Shoreham Heat Network</b></li> </ul> <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>are on Shoreham Beach.</b> The remains of Shoreham Fort, a Scheduled Monument, 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>	For effectiveness. Due to a printing error, the area priorities and paragraphs 4.6.1-4.6.4 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.	The new Area Priority provides a strong signal that development of the Shoreham Heat Network will be supported within this area. This has positive implications for SA objective, and is a change from the previous policy position and will require re-appraisal.  The re-appraisal of this policy is included within the Sustainability Appraisal report that accompanies this schedule.

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<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 by anglers and home to the National Coastwatch Institute look-out tower.</p> <p>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.</p>		
18	CA6 (9) – new clause	Submission	<p><b>9. The councils will support the development of infrastructure to deliver the Shoreham Heat Network.</b></p> <p><i>Consequent change to supporting text (new paragraph)</i></p> <p><b><u>4.6.17 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></b></p>	To be positively prepared and effective, the modification reflects the findings of the <i>Shoreham Harbour District Energy Feasibility Study</i> (2018); and the current status of the Shoreham Heat Network project.	<p>As described above, clause 9 provides a strong signal that development of the Shoreham Heat Network will be supported within this area, in particular in relation to any required infrastructure. This has positive implications for SA objective 1 and is a change from the previous policy position and will require re-appraisal.</p> <p>The supporting text provides further details on the Heat Network and confirms that the network would be served by marine source heat pumps and gas CHP. It also confirms that the infrastructure required, such as pumps and pipework, would be located within the harbour mouth area.</p> <p>Provision of a heat network will have positive implications for SA objective 1 and SA objective 11. This is a change from the previous SA assessment, whereby the policy was found to have no impact on objective 1.</p> <p>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. This is also a change from the previous SA.</p> <p>These modifications are considered to change the previous SA assessment for some of the SA objectives, and require a re-assessment of the policy.</p> <p>The re-appraisal of this policy is included within the Sustainability Appraisal report that accompanies this schedule.</p>
19	CA7 new clauses	Submission	Insert new clauses after (2):	To be justified and effective the modification to clause 3 reflects recent	New clause 3 is considered to indirectly positively impact upon the SA objective 11 as it will ensure the

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<p><b>3. <u>Proposals for sites WH1 and WH2 will be required to demonstrate that potential implications for the navigational safety of vessels entering and leaving Shoreham Port have been addressed in agreement with statutory bodies, including Shoreham Port Authority. In particular, development proposals must demonstrate that artificial lighting originating from proposed development will not impact the visibility of navigation lights in the harbour mouth.</u></b></p> <p><b>4. <u>The councils will support the development of the Shoreham Heat Network. Until the network is constructed, development will be required to incorporate the necessary infrastructure for connection to future networks. When the network is constructed, development will be required to connect.</u></b></p> <p><i>Renumber subsequent clauses accordingly</i></p> <p><i>Add new area priority:</i></p> <ul style="list-style-type: none"> <li><b><u>To support the delivery of the Shoreham Heat Network</u></b></li> </ul> <p><i>Consequent changes to supporting text (new paragraphs)</i></p> <p><b><u>Shoreham Heat Network</u></b></p> <p><b><u>4.7.74 The Western Harbour Arm allocation is identified in the Shoreham Harbour District Energy Feasibility Study (2018) for the 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 Partnership, Adur District Council, West Sussex County Council and Shoreham Port Authority.</u></b></p> <p><b><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></b></p>	<p>representations from Shoreham Port Authority on planning applications in the Western Harbour Arm, with potential to impact on port navigation.</p> <p>Suggested in response to Inspector's question 1 and discussion at hearings. To be justified and effective, the modification to clause 4 reflects 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>Suggested in response to Inspector's question 2 and discussion at hearings.</p>	<p>safety of ships and their crew, and also objective 17 as it will ensure that ships can continue to safely navigate the harbour. Impacts on these objectives were mixed in the previous assessment due to health 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. No change to previous SA resulting from this modification.</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, as it will provide a renewable source of heat and therefore help to conserve energy, and SA objective 11, as it may help to reduce the risk of future fuel poverty for residents. As described under the modifications to SH6, marine source heat pump 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.</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.</p> <p>The new 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.</p> <p>No change to previous SA.</p>
20	CA7 (131)	Submission	Developments should be set back <b>sufficiently</b> from the A259 corridor <b>in agreement with the</b>	To be effective it is necessary to clarify the	Amended clause 13 is considered to impact

Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are <b>shown in bold text</b> . 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
			<u>highways and planning authorities, to provide space for a high-quality segregated cycle route which provides stepped separation from road vehicles and pedestrian facilities, to deliver green infrastructure improvements, and</u> to prevent a canyoning effect <del>and</del> to ensure that residents are protected from noise and air quality impacts.	purpose and requirements for the setback of development from the A259. Suggested to respond to an issue raised in Representation: 2017-0401 (Hyde New Build Ltd) Clause renumbered as a result of modification 19.	positively on SA objective 13 and SA objective 4; 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.  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. 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.
21	Policy SH10 (3)	Pre-Hearing	Direct agreements with utility providers may be required to provide <b>infrastructure, such as sewerage infrastructure.</b>	To be effective, the modification addresses 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 in Representation: 2017-0601 (Southern Water).	Typographical correction. No SA implications.
22	5.1.20	Submission	The following items of infrastructure are typically likely to be requirements for major developments within the allocated sites: <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>• <b>Contributions to green infrastructure</b></li> <li>• Remediation of contaminated areas</li> <li>• On-site renewable energy systems / low carbon technologies</li> </ul>	To be effective, it is necessary to clarify the requirement for development to contribute towards green infrastructure provision. Suggested in response to an issue raised in Representation: 2017-1015 (Sussex Wildlife Trust)	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. However it does not change the SA score.
23	5.1.25	Pre-Hearing/ Hearing	The local authorities undertake ongoing monitoring of their Local Development Frameworks of which this JAAP is a part <b>The monitoring framework is set out in the Appendix. It includes key monitoring indicators and triggers for potential intervention.</b> Progress on the delivery of the <b>plan will be reported in key opportunity development sites will be contained with</b> the Authority Monitoring Report (AMR) for <b>Adur District Council and Brighton &amp; Hove City Council each respective council. This will include the housing trajectory for Shoreham Harbour Regeneration Area.</b>	To be effective, positively prepared and consistent with national policy, it is necessary to provide a robust monitoring mechanism to support the effective delivery of the Plan. To add reference to the housing trajectory. Suggested in response to Inspector's question 35.	This modification clarifies that monitoring of delivery of the entire plan will be reported and won't be confined to key development sites, and will include monitoring of the housing trajectory.  This is not considered to impact on the SA.

Shoreham Harbour Joint Area Action Plan Appendix – Monitoring Framework

SA objective	Relevant policy	Target	Indicator	Partners / Source of information	Trigger	Actions required (if target is not being achieved)
<b>Objective 1: Climate change, energy and sustainable buildings</b>						
1, 2, 10,	SH1	All development proposals to be accompanied by a Sustainability Statement (ADC) or Sustainability Checklist (BHCC)	1. Number and percentage of approved proposals accompanied by a Sustainability Statement/Checklist	Development Management	Development approved without a Sustainability Statement/Checklist	<ul style="list-style-type: none"> <li>Engage with developers at an early stage to ensure the requirement for Sustainability Statement/Checklist is understood.</li> <li>Review of validation processes to ensure proposals are not accepted without a Sustainability Statement/Checklist.</li> </ul>
1, 10, 22	SH1	Increase the energy efficiency of buildings in the Shoreham Harbour Regeneration Area	2. Number and percentage of approved and/or completed developments meeting minimum standards for energy efficiency	Development Management: Sustainability Statement/Checklist	Development approved and/or completed that does not meet minimum standards for energy efficiency.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that the principles of energy efficiency are integrated.</li> <li>Review of development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>
			3. Number and percentage of approved and/or completed developments achieving zero-carbon status	Development Management: Sustainability Statement/Checklist	No development approved and/or completed that achieves zero-carbon status.	
1, 10	SH1	Increase the generation of renewable/low carbon energy within the Shoreham Harbour Regeneration Area	4. Number and percentage of approved and/or completed developments incorporating renewable/low carbon energy generation	Development Management: Sustainability Statement/Checklist	Development approved and/or completed that does not incorporate renewable/low carbon energy generation.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that the requirement for renewable/low energy generation is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Identify sources of funding to support delivery of renewable/low carbon energy generation.</li> </ul>
			5. Type and capacity (kW) (predicted) of approved and/or completed renewable/low carbon energy development/installations	Development Management: Sustainability Statement/Checklist	No increase in capacity of renewable/low carbon energy development/installations	
1, 10, 11	SH1	Increase the delivery of heating/cooling networks supplied by renewable/waste energy sources.	6. Number and percentage of approved and/or completed developments that include: <ol style="list-style-type: none"> <li>Connection to existing heating/cooling network</li> <li>Site-wide heating/ cooling network</li> <li>Building-wide heating/ cooling network</li> <li>Individual heating/ cooling system</li> </ol>	Development Management: Sustainability Statement/Checklist	Development approved and/or completed with individual heating/ cooling systems installed.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that the requirement for compliance with the heating hierarchy is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Identify sources of funding to support delivery of heating/cooling networks.</li> </ul>
			7. Number and type of approved and/or completed development supplied by: <ol style="list-style-type: none"> <li>Renewable/waste energy sources</li> <li>Low carbon technologies</li> <li>Conventional systems</li> </ol>	Development Management: Sustainability Statement/Checklist	Development approved and/or completed with conventional heating/ cooling systems installed.	

SA objective	Relevant policy	Target	Indicator	Partners / Source of information	Trigger	Actions required (if target is not being achieved)
			8. Type and capacity (kW) (predicted) of heating/ cooling from renewable/waste/low carbon sources.	Development Management: Sustainability Statement/Checklist	No increase in capacity of renewable/waste/low carbon sources.	
2, 10	SH1	Increase water efficiency of buildings in the Shoreham Harbour Regeneration Area	9. Number and percentage of approved and/or completed residential developments where internal water use does not exceed 110 litres per head per day.	Development Management: Sustainability Statement/Checklist	Residential development approved where internal water use exceeds 110 litres per head per day	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that the principles of water efficiency are integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>
			10. Number and percentage of approved and/or completed non-domestic developments achieving BREEAM 'excellent' standard.	Development Management: Sustainability Statement/Checklist	Non-residential development approved that does not meet BREEAM 'excellent' standard	
2, 9, 10	SH1	Increase recycling, harvesting and/or conservation of water	11. Number and percentage of approved and/or completed developments that incorporate measures to recycle, harvest and/or conserve water, by type.	Development Management: Sustainability Statement/Checklist	No development approved that incorporates measures to recycle, harvest and/or conserve water	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that the potential to recycle, harvest and conserve water is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Identify sources of funding to support delivery of measures to reduce, harvest and conserve water.</li> </ul>
<b>Objective 2: Shoreham Port</b>						
3, 17	SH2, CA1, CA2, CA3, CA5, CA6, CA7	Consolidate Shoreham Port operations in the Eastern Arm and Canal	12. Number and type of port-related operations relocated to the Eastern Arm and Canal	Development Management; Shoreham Port Authority	Port-related operations are not relocated to the Eastern Arm and Canal	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with operators and Shoreham Port Authority to identify suitable sites for relocation.</li> <li>Identify sources of funding to assist with relocation, and development of port-related operations in the Eastern Arm and Canal</li> </ul>
			13. Number and type of new port related development in the Eastern Arm and Canal	Development Management; Shoreham Port Authority	Port-related development in the Eastern Arm and Canal is not delivered	
<b>Objective 3: Economy and employment</b>						
3, 17, 21	SH3, CA2, CA3, CA5, CA6, CA7	Deliver a minimum of 23,500m <sup>2</sup> employment generating floorspace: <ul style="list-style-type: none"> <li>16,000m<sup>2</sup> in Adur</li> <li>7,500m<sup>2</sup> in Brighton &amp; Hove</li> </ul>	14. Total amount of approved and/or completed development of employment floorspace by type	Development Management; Developers; Economic Development; WSCC	Delivery of employment floorspace is insufficient to meet minimum target over the plan period	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Engage with site owners to identify barriers to sites coming forward</li> <li>Engage with Economic Development to identify current and projected demand for employment floorspace.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of employment floorspace.</li> <li>Seek further employment sites to allocate through policy review.</li> </ul>

SA objective	Relevant policy	Target	Indicator	Partners / Source of information	Trigger	Actions required (if target is not being achieved)
	SH3, CA2, CA3, CA5, CA6, CA7	Protect identified employment sites from conversion to residential dwellings	15. Total amount of employment floorspace converted by permitted development to residential dwellings by type 16. No of residential dwellings delivered through conversion of employment floorspace by permitted development.	Development Management; Developers; Economic Development	Trends demonstrate an increase in the amount of employment floorspace lost as a result of conversion to residential dwellings by permitted development	<ul style="list-style-type: none"> <li>Review development management processes to ensure that existing protection in GPDO is applied.</li> <li>Consider removal of permitted development rights through an Article 4 Direction.</li> <li>Identify sources of funding to assist with retention of sites in employment generating uses.</li> </ul>
3, 17, 19	SH3, CA2, CA3, CA7	Provide ancillary retail uses within the Shoreham Harbour Regeneration area to complement existing town/district centres	17. Total amount of approved and/or completed development of retail floorspace by type	Development Management); Developers; Economic Development; WSCC	Development approved and/or completed that includes retail with a net sales floorspace of 1,000m <sup>2</sup> or more	<ul style="list-style-type: none"> <li>Engage with Economic Development to identify current and projected demand for retail floorspace.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Review development management processes to ensure retail sequential and impact assessments are provided.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> </ul>
<b>Objective 4: Housing and community</b>						
3, 14, 15, 16	SH4, CA2, CA3, CA6, CA7	Deliver a minimum of 1,400 new homes: <ul style="list-style-type: none"> <li>90 in CA2: Aldrington Basin</li> <li>201 in CA3: South Portslade</li> <li>1,100 in CA7: Western Harbour Arm</li> <li>Windfall sites</li> </ul>	18. Number, size and tenure of approved and/or completed residential development	Development Management; Developers; WSCC	Delivery of residential development is insufficient to meet minimum target over the plan period (identified in the housing trajectory)	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Engage with site owners to identify barriers to bringing sites forward</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of residential development.</li> <li>Seek further housing sites to allocate through policy review.</li> </ul>
3, 11, 14, 15, 16,	SH4, CA2, CA3, CA6, CA7	Deliver affordable housing according to local policy	19. Number, size and tenure of approved and/or completed affordable homes, and as a percentage of all homes built	Development Management; Developers; Registered Providers; Housing departments	Delivery of affordable housing does not comply with local policy requirements	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Engage with site owners to identify barriers to bringing sites forward</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of affordable housing</li> <li>Seek further housing sites to allocate through policy review.</li> </ul>
3, 11, 14, 16, 17, 19, 21	SH4, CA2, CA3, CA5, CA7, SH10	Deliver social and community infrastructure to support new development	20. Number and type of approved and/or completed D class floorspace and social/community facilities	Development Management; Developers; Commercial operators; Public and private sector partners	Insufficient delivery of social/community facilities	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Engage with public and private sector partners to identify demands for community/social facilities</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of community/social facilities</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>

Objective 5: Sustainable travel						
7, 11, 13, 14, 19, 20	SH5, CA1, CA2, CA3, CA4, CA5, CA6, CA7, SH10	Deliver new/improved routes and facilities for pedestrians and cyclists, including: <ul style="list-style-type: none"> <li>• New waterfront route from Shoreham –by-Sea town centre to Kingston Beach</li> <li>• New segregated cycle route along A259 from Shoreham-by-Sea town centre to Hove Lagoon</li> <li>• Improvements to NCN2/Monarch's Way/England Coast Path at Basin Road South and A259</li> <li>• Improvements to crossing at Southwick Lock Gates</li> <li>• Extension of bike share scheme</li> </ul>	21. Number and type of approved and/or completed new/improved routes for pedestrians and cyclists	Development management; Developers; Highways; Shoreham Port Authority; Private and public sector partners	New/improved routes for pedestrians and cyclists are not delivered	<ul style="list-style-type: none"> <li>• Identify reasons for lack of implementation</li> <li>• Engage with developers at an early stage in the design of new developments to ensure that the improved routes for pedestrians and cyclists are integrated.</li> <li>• Engage with public and private sector partners to identify demand for improvements</li> <li>• Engage with public transport operators to identify potential improvements</li> <li>• Review Shoreham Harbour Transport Strategy</li> <li>• Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>• Consider negotiation on individual sites to address viability issues.</li> <li>• Identify sources of funding to assist with delivery of sustainable travel measures</li> </ul>
		Deliver improved priority corridors and junction improvements, including: <ul style="list-style-type: none"> <li>• A259</li> <li>• A283</li> <li>• A293</li> </ul>	22. Number and type of approved and/or completed improvements to priority corridors and junctions	Development Management; Highways	Improvements to priority corridors and junctions are not delivered.	
		Deliver improved access to port activities, including: <ul style="list-style-type: none"> <li>• Southwick Waterfront access road</li> <li>• Basin Road North extension</li> </ul>	23. Improvements to port access approved and/or completed	Development Management; Highways; Shoreham Port Authority	Improvements to port access are not delivered	
		Deliver improvements and improve interchange with public transport network	24. Improvements to bus services delivered 25. Improvements to bus stops delivered 26. Bus priority measures delivered 27. Improvements to interchanges at railway stations delivered	Highways; Public transport operators	Improvements to public transport are not delivered	
Objective 6: Flood risk and sustainable drainage						
2, 3, 4, 9, 10, 18	SH6, CA1, CA2, CA3, CA4, CA5, CA6, CA7	Reduce flood risk	28. Number of planning permissions granted contrary to the advice of the Lead Local Flood Authority and/or the Environment Agency on flood defence grounds	Development Management; Lead Local Flood Authority; Environment Agency	Any such permissions are granted	<ul style="list-style-type: none"> <li>• Identify reasons for approval of permission contrary to Lead Local Flood Authority and/or Environment Agency advise</li> <li>• Engage with developers at an early stage in the design of new developments to ensure that the Lead Local Flood Authority and Environment Agency are consulted.</li> <li>• Review development management processes to ensure applications are determined in accordance with policy.</li> <li>• Review Shoreham Harbour Flood Risk Management Guide</li> <li>• Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>

3, 4, 9, 10, 11, 18, 20	SH6, CA1, CA2, CA3, CA4, CA5, CA6, CA7, SH10	Deliver new/upgraded flood defences, including: <ul style="list-style-type: none"> <li>Sussex Yacht Club</li> <li>Western Harbour Arm</li> <li>Kingston Beach</li> <li>Lock Gates</li> <li>Canal</li> </ul>	29. New/upgraded flood defences delivered 30. Developer contributions to flood defences	Development Management; Developers; Environment Agency; Shoreham Port Authority	New/upgraded flood defences are not delivered.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that the new/improved flood defences are integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Engage with public and private sector partners to identify demand for improvements</li> <li>Engage with Environment Agency and Lead Local Flood Authorities to identify potential improvements</li> <li>Review Shoreham Harbour Flood Risk Management Guide</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of flood defence measures</li> </ul>
2, 4, 6, 9, 10, 18,	SH1, SH6, SH7, CA1, CA2, CA3, CA4, CA5, CA6, CA7, SH10	Maximise the provision of sustainable drainage systems	31. Number and percentage of approved and/or completed developments that incorporate sustainable drainage systems.	Development Management; Lead Local Flood Authorities; Developers; Sustainability Statement/ Checklist	Development approved and/or completed that does not incorporate sustainable drainage systems.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that sustainable drainage systems are integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> </ul>
<b>Objective 7: Natural environment, biodiversity and green infrastructure</b>						
4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 16, 18, 19, 20, 22	SH1, SH7, SH8, CA2, CA3, CA4, CA5, CA6, CA7, SH10	Increased provision of green infrastructure All development to provide a net gain to biodiversity Protect and enhance designated and non-designated sites and habitats, including: <ul style="list-style-type: none"> <li>Adur Estuary SSSI</li> <li>Shoreham Beach LNR/LWS</li> <li>Basin Road South LWS</li> <li>North Canal Bank</li> <li>Coastal vegetated shingle</li> <li>Intertidal mudflats</li> </ul>	32. Type and extent of green infrastructure improvements delivered 33. Number and percentage of planning permissions granted that deliver a net gain to biodiversity 34. Number of planning permissions granted contrary to officer/statutory consultee advice on the grounds of impact to habitats/species. 35. Type and extent of habitats lost 36. Type and extent of habitats created 37. Developer contributions to green infrastructure/ biodiversity 38. State or condition of designated sites	Development Management; Sustainability Statement/ Checklist; Environment Agency; Natural England Sussex Wildlife Trust Sussex Biodiversity Records Centre; Parks	No increase in provision of green infrastructure Development approved that does not provide a net gain in biodiversity. Loss of priority habitats No creation of new habitats. Decline in status or condition of designated sites.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage in the design of new developments to ensure that green infrastructure and biodiversity gains are integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Engage with public and private sector partners to identify demand and potential for improvements</li> <li>Review Shoreham Harbour Green Infrastructure Strategy</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of green infrastructure and biodiversity measures</li> </ul>
7, 11	SH4, SH7, CA2, CA3, CA5, CA6, CA7	No increase in noise impacts due to development.	39. Number of planning permissions granted contrary to officer advice on the grounds of noise impact.	Development Management; Environmental Health	Application granted contrary to officer advice on the grounds of noise impact.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Engage with developers at an early stage to ensure that avoidance and mitigation of noise impacts is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>

7, 10, 11	SH4, SH7, CA2, CA3, CA5, CA6, CA7	Improve air quality, especially within Air Quality Management Areas	40. Number of planning permissions granted contrary to officer advice where impact on air quality was an important factor 41. Air quality monitoring (including CO <sub>2</sub> , NO <sub>2</sub> and particulate concentrations). 42. Number and extent of Air Quality Management Areas identified in the vicinity of the Shoreham Harbour Regeneration Area.	Development Management; Environmental Health	Application granted contrary to officer advice on the grounds of air quality impact. A decline in air quality. Designation of new, or extension of existing, air quality management areas.	<ul style="list-style-type: none"> <li>Identify reasons for decline in air quality.</li> <li>Engage with developers at an early stage to ensure that avoidance and mitigation of air pollution is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>
2, 4, 5, 9, 10, 11	SH7, CA2, CA3, CA5, CA6, CA7	Protect/improve water quality	43. Number of planning permissions granted contrary to the advice of the Environment Agency on water quality grounds. 44. Status of groundwater and waterbodies	Development Management; Environment Agency	Application granted contrary to the advice of the Environment Agency on water quality grounds. Decline in status of groundwater or waterbodies.	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Identify reasons for decline in status of groundwater and/or water bodies</li> <li>Engage with developers at an early stage to ensure that avoidance and mitigation of water quality impacts is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>
3, 4, 8, 9, 10, 11	SH7, CA2, CA3, CA5, CA6, CA7	Remediate contaminated sites	45. Number of approved and/or completed developments which incorporate remediation of contaminated land, and extent of remediated land	Development Management; Environment Agency; Sustainability Statement/ Checklist	Contaminated sites are not remediated	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage to ensure that remediation of contaminated land is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of remediation measures.</li> </ul>
3, 8, 9, 10, 22	SH7, CA2, CA3, CA5, CA6, CA7	Reduce waste and increase recycling	46. Number and percentage of planning permissions granted that included a Site Waste Management Plan	Development Management; Sustainability Statement/ Checklist	Planning permissions granted without a Site Waste Management Plan	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>

Objective 8: Recreation and leisure						
3, 4, 5, 6, 7, 10, 11, 16, 19, 20	SH7, SH8, CA2, CA3, CA4, CA5, CA6, CA7	Increase provision of public open space	47. Amount of public open space lost to development 48. Amount of public open space created	Development Management; Parks	Loss of public open space to development. No provision of new public open space	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage to ensure that provision of open space is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of public open space.</li> </ul>
3, 4, 5, 6, 7, 9, 10, 11, 16, 19, 20	SH7, SH8, CA2, CA3, CA4, CA5, CA6, CA7	Improve public access to waterfront	49. Number and type of improvements delivered	Development management	No improvement in access to waterfront	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage to ensure that public access to waterfront is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>Consider negotiation on individual sites to address viability issues.</li> <li>Identify sources of funding to assist with delivery of public access to waterfront.</li> </ul>
Objective 9: Place making and design quality						
5, 7, 10, 11, 12, 14, 16, 17, 19, 20	SH9, CA2, CA3, CA5, CA6, CA7	Deliver high standard of urban design, place making and amenity	50. Number and percentage of approved and/or completed developments subject to design review. 51. Number of planning appeals dismissed where urban design, place making and/or amenity are principal reason(s) for refusal. 52. Number of design awards nominated and won by developments in the Shoreham Harbour Regeneration Area	Development Management	Major development approved and/or completed that has not been subject to design review. Planning appeal upheld where urban design, place making and/or amenity are principal reason(s) for refusal	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Identify reasons for upholding of appeal.</li> <li>Engage with developers at an early stage to ensure that high quality place making and urban design are integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>
5, 11, 16, 19, 20	SH9, CA2, CA3, CA4, CA5, CA6, CA7	Deliver new public art	53. Number of public art schemes delivered as part of new development	Development Management	No new public art schemes delivered	<ul style="list-style-type: none"> <li>Identify reasons for lack of implementation.</li> <li>Engage with developers at an early stage to ensure that provision of public art is integrated.</li> <li>Review development management processes to ensure applications are determined in accordance with policy.</li> <li>Consider preparation of further supplementary guidance and/or case studies of best practice.</li> </ul>

Infrastructure						
2, 3, 4, 5, 6, 7, 13, 15, 16, 17, 18, 19, 21, 22	SH1, SH2, SH3, SH4, SH5, SH6, SH7, SH8, SH9, SH10, CA1, CA2, CA3, CA4, CA5, CA6, CA7	Deliver infrastructure made necessary by the development	54. Delivery of schemes identified in the Infrastructure Delivery Plans 55. Developer contributions to infrastructure	Development Management; Environment Agency; Environmental Health; Highways; Education; Lead Local Flood Authority;	Under delivery of schemes identified in the Infrastructure Delivery Plan	<ul style="list-style-type: none"> <li>• Identify reasons for lack of implementation.</li> <li>• Engage with developers at an early stage to ensure that infrastructure requirements are integrated.</li> <li>• Review development management processes to ensure applications are determined in accordance with policy.</li> <li>• Consider preparation of further supplementary guidance and/or case studies of best practice.</li> <li>• Consider negotiation on individual sites to address viability issues.</li> <li>• Identify sources of funding to assist with delivery of public access to waterfront.</li> </ul>



