



planning advisory service

Soundness Self-Assessment Checklist (March 2014)

PROPOSED SUBMISSION SHOREHAM HARBOUR JOINT AREA ACTION PLAN

SOUNDNESS SELF-ASSESSMENT CHECKLIST

MAY 2018



ADUR DISTRICT
COUNCIL



Brighton & Hove
City Council



shoreham port

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Soundness Test and Key Requirements	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>	

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<p>Both the <i>Adur Local Plan 2017</i> and the <i>Brighton & Hove City Plan Part One (2016)</i> identify the regeneration of the Shoreham Harbour area in their strategic objectives. Both plans also contain a policy that identifies the harbour as a 'broad location' for future strategic development. As such, the Vision, objectives, and character area priorities are consistent with these local plans.</p> <p>The character area priorities set out the vision for each character area. The character area policies will deliver these priorities through character area specific allocations. These character area policies and allocations set out what the policies will deliver in both Adur and Brighton & Hove.</p> <p>It is not considered that there are any 'policy gaps'.</p> <p>The Joint Area Action Plan contains Maps that show the character areas and allocations. This effectively communicates where the character areas will deliver the various elements of the vision, objectives, and area priorities.</p> <p>Part 2. of the <i>Sustainability Appraisal</i> of the Joint Area Action plan sets out the reasonable alternatives considered during the production of the plan.</p> <p>Different alternatives were explored in detail through previous consultations, in responses to changes within the <i>Adur Local Plan 2017</i> and the <i>Brighton & Hove City Plan Part One (2016)</i>.</p> <p>Assessment of the objectively assessed need (OAN) for housing has been undertaken for both Adur and Brighton & Hove respectively. The character area policies of the Joint Area Action Plan will contribute to meeting the OAN for each of these areas. This has further been considered in the accompanying <i>Delivery Topic Paper</i>. This provides figures for planning permission approvals in the regeneration area and the contribution</p>

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	<p>this has made to the policy targets.</p> <p>Section 5. Delivery and implementation of the Joint Area Action Plan discusses delivery, implementation and monitoring of the Plan. This has further been considered in the accompanying <i>Delivery Topic Paper</i>.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.</p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <ul style="list-style-type: none"> —any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or —specific policies in this Framework indicate development should be restricted. 	<p>The accompanying <i>Housing Topic Paper</i> considers how the Joint Area Action Plan will contribute to the OAN housing need for both Adur and Brighton & Hove.</p> <p>The accompanying <i>Delivery Topic Paper</i> highlights the permissions already approved for housing. The paper then balances these against the approved applications for employment space, and environmental benefits, showing a commitment to delivering sustainable development. This has been achieved through the seven distinct character areas, meeting the priorities for each area.</p> <p>The <i>Sustainability Appraisal (SA)</i> addresses quantum, strategy and distribution of development (Capacity/ existing development pattern of the Joint Area Action Plan area limits options). The accompanying Housing Topic Paper addresses other issues not included in the SA.</p> <p>Various evidence, including:</p> <ul style="list-style-type: none"> • <i>Capacity and Viability Study (2010)</i> • <i>Adur District Energy Strategy (2009) and Brighton & Hove Renewable and Sustainable Energy Study (2012)</i>

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	<ul style="list-style-type: none"> • <i>The Brighton & Hove Energy Study (2013)</i> • <i>Shoreham Harbour Heat Network Study (2016)</i> • <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> • <i>The Adur Local Plan & Shoreham Harbour Transport Study (2013) and addendums (2014; 2016)</i> • <i>Brighton Marina to River Adur Coastal Strategy Study</i> • <i>Shoreham Harbour Ecology and Green Infrastructure Study (2015)</i> • <i>The Adur District Open Spaces Study (2014)</i> • <i>Open Space Update Study (2011).</i> • <i>Urban Sustainable Drainage System Feasibility Study (2015, Brighton & Hove City Council)</i> • <i>The Western Harbour Tall Buildings Capacity Study (2017)</i> • <i>A Reptile Survey (2009)</i> • <i>Great Crested Newt Pond Survey (2009)</i> • <i>Adur Local Plan and Brighton & Hove City Plan Part One were screened for</i>

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	<p><i>Habitats Regulations Assessment (HRA)</i></p> <ul style="list-style-type: none"> • <i>Shoreham Harbour Joint Area Action Plan Habitats Regulations Assessment Screening Report (2018)</i> • <i>West Sussex County Council has prepared a Statement of Common Ground (2016) for minerals</i> • <i>Economic Impact Assessment (GL Hearn, 2013)</i> • <i>The Adur & Worthing and Brighton & Hove Strategic Flood Risk Assessments</i> • <i>Adur and Worthing Councils' Strategic Flood Risk Assessment (SFRA)</i> • <i>Brighton & Hove Strategic Flood Risk Assessment (SFRA, 2012)</i> • <i>Shoreham Harbour Vegetated Shingle Assessment (2015)</i> • <i>Shoreham Harbour Flood Risk Management Guide SPD (2015)</i> • <i>Both Adur and Brighton & Hove councils have carried out sequential and exceptions tests for the regeneration area.</i> • <i>Biosphere Management Strategy (2014-2019) and the South East River Basin Management Plan (2016).</i> • <i>Rivers Arun to Adur Flood and Erosion Management Strategy (2010)</i>

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<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<p>The Joint Area Action Plan includes supporting information regarding the presumption in favour of sustainable development. In Section 1. Spatial strategy, paragraph 2.1.3 states that the aim is to deliver a series of appropriately located, high quality, sustainable, mixed-use developments including new housing, employment floorspace, leisure opportunities, improved public space and associated infrastructure including flood defences and transport improvements.</p> <p>Paragraph 1.1.3 of the Joint Area Action Plan The plan builds on and complements the <i>Adur Local Plan 2017</i> and the <i>Brighton & Hove City Plan Part One (2016)</i>. Planning applications within the regeneration area must comply with the strategy and policies in the Joint Area Action Plan, as well as the relevant local plans.</p> <p>Owing to this, the Joint Area Action Plan will take into account Policy 1 of the <i>Adur Local Plan 2017</i>, and SS1 of the <i>Brighton & Hove City Plan Part One (2016)</i>, as these are the model policies regarding sustainable development.</p> <p>Paragraph 2.1.5 of the Joint Area Action Plan states that sustainable development is an overarching theme for this plan, and the local plans for both Adur and Brighton & Hove.</p>
<p><i>Objectively assessed needs</i> The economic, social and environmental needs of the authority</p>	<p>The proposals in the Joint Area Action Plan will contribute to delivering housing in the local area. Most up-to-date assessment of housing needs is:</p>

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<p>area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<ul style="list-style-type: none"> • Adur needs 6,825 homes up to 2032). This is 325 homes per year. The full objectively assessed housing need cannot be met and the Adur Local Plan aims to deliver 3,718 dwellings over the plan period. • The objectively assessed housing need for Brighton & Hove that informed the City Plan Part One was 30,120 homes up to 2030. It was accepted this could not be met. Consequently the adopted City Plan Part One sets a housing target of 13,200 dwellings over the plan period. <p>These forecasts have informed the production of the Joint Area Action Plan. See also the <i>Housing Topic Paper</i>.</p> <p>The proposals in the Joint Area Action Plan will contribute to providing employment space in the local area. Most up to date assessment of employment space is as follows:</p> <ul style="list-style-type: none"> • For Adur, an <i>Employment Land Review (2014)</i> identified the requirement for: 15,000 to 20,000m² office and research and development floorspace (use classes B1a and B1b); and, 35,000 to 40,000m² warehouse floorspace (use class B8) • For Brighton & Hove, the <i>Employment Land Review (2012)</i> identified the requirement for 112,240m² office floorspace (use classes B1a and B1b); and, 43,430 m² industrial floorspace (use classes B1c, B2 and B8) <p>These forecasts have informed the production of the Joint Area Action Plan. See also the <i>Economy Topic Paper</i>.</p>

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	<p>The accompanying <i>Delivery Topic Paper</i> considers both housing and employment space, highlighting the planning permissions approved, and the contribution this has made to the Joint Area Action Plan policies. This provides the figures for the whole regeneration area, both Adur and Brighton & Hove respectively, and for each character area.</p>
<p>NPPF Principles: Delivering sustainable development</p>	
<p>1. Building a strong, competitive economy (paras 18-22)</p>	
<p>Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),</p>	<p>Policy SH3: Economy and employment sets out the economic vision for the Joint Area Action Plan. This vision has been informed by a number of documents including the Coast to Capital LEP's <i>Skills Strategy (Skills for Growth, 2015)</i>, as well as the preliminary <i>Economic Impact Assessment (GL Hearn, 2013)</i> which has indicated that the proposals could generate a significant net increase in employment and additional economic output.</p> <p>Further detail regarding the approach to economic development in the Joint Area Action Plan is set out in the <i>Employment Topic Paper</i>.</p>
<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<p>Section 5. Delivery and implementation states that the regeneration plans are being driven by the Shoreham Harbour Regeneration Partnership. Members of the Partnership signed up to a renewed joint commitment to deliver renewal plans for the harbour via a <i>Memorandum of Understanding</i> signed in 2011. The role of the partnership is to provide a dedicated resource to work with developers and investors to facilitate bringing forward packages of catalyst sites and local area improvement projects.</p> <p>Paragraph 1.1.2 of the Joint Area Action Plan states that an area action plan is a type of</p>

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	<ul style="list-style-type: none"> ○ CA7 – Western Harbour Arm: The Western Harbour Arm is mostly an employment area. It includes an allocation for proposed development at Western Harbour Arm Waterfront. This will deliver a minimum of 1,100 new homes and 12,000m² employment generating floorspace. ○ CA5 – Fishersgate and Southwick: The area includes an allocation for proposed development at Southwick Waterfront. This will deliver a minimum of 4,000m² employment generating floorspace. <ul style="list-style-type: none"> ● Brighton & Hove Character Area policies: <ul style="list-style-type: none"> ○ CA2 – Aldrington Basin: The area includes an allocation for proposed development of a minimum of 4,500m² employment generating floorspace and 90 new homes. ○ CA3 – North Quayside and South Portslade: South Portslade is mostly an employment area. It includes an allocation for proposed development of a minimum of 3,000m² employment generating floorspace and 210 new homes. <p>Paragraph 3.1.7 of the Joint Area Action Plan states that the Coast to Capital Local Economic Partnership (LEP) and the Greater Brighton City Deal are promoting the potential for district heating networks and an eco-technology cluster at Shoreham Harbour. There is significant potential to leverage investment and resources for delivery in this area.</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>	

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<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<p>The Shoreham Harbour Regeneration Area does not specifically include any town centres. However, the Joint Area Action Plan complies with Policy 28: Retail Town Centre, and Policy 11: Shoreham-By-Sea, which regard appropriate and compatible town centre uses. This has been taken into account in Policy SH3 Economy and employment of the Joint Area Action Plan:</p> <ul style="list-style-type: none"> • Clause 7: As part of mixed-use redevelopments, small-scale, ancillary retail uses are acceptable provided that such activity will assist in enlivening key frontages and supporting existing retailing areas. Proposals should be appropriate and complementary in relation to Shoreham-by-Sea town centre and the existing district centre designation on Boundary Road/Station Road.
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<p>See response above.</p>
<p>3. Supporting a prosperous rural economy (para 28)</p>	
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<p>N/A</p>
<p>4. Promoting sustainable transport (paras 29-41)</p>	
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport</p>	<p>The <i>Shoreham Harbour Transport Strategy</i> identifies a dedicated, safe and continuous cycle facility along the A259 from Wharf Road to Adur Ferry Bridge, providing a core cycle route, a critical item of infrastructure. Reducing the intimidating nature of the A259 corridor for cyclists with quality surfacing, clear signing, and provision for cycles at side roads or accesses. The A259 does not currently have good infrastructure for cyclists and is heavily used by motor vehicles, including HGVs. However the road</p>

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<p>solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p>	<p>provides the most direct route between Hove and Shoreham-by-Sea. Many cyclists therefore use this route. The partnership is exploring the potential for dedicated cycle facilities along this route.</p> <p>The <i>Shoreham Harbour Transport strategy</i> takes a balanced view of transport provision in the regeneration area focusing on improvements to the existing road network and measures to encourage the use of sustainable modes of transport. Five key outcomes are identified in the strategy:</p> <ul style="list-style-type: none"> • OC1 Reduced levels of congestion • OC2 Strengthened sustainable transport mode share • OC3 Improved connectivity • OC4 A safe and attractive environment • OC5 Adequate parking provision and controls <p>Policy SH5: Sustainable travel of the Joint Area Action Plan addresses sustainable transport measures that will contribute to health objectives. This includes reducing the need for car travel, delivering improvements set out in the Shoreham Harbour Transport Strategy, giving pedestrians and cyclists priority over vehicular traffic wherever possible, improving priority corridors thus minimising the impact of traffic, and seeking developer contributions for highways improvements and infrastructure.</p> <p>Two further area wide policies reinforce the health contributions as set out in SH5:</p> <ul style="list-style-type: none"> • Policy SH7: Natural environment, biodiversity and green infrastructure: This

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<p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>	<p>policy requires developers to integrate new green infrastructure, and contribute to enhancements to the green corridor.</p> <ul style="list-style-type: none"> • Policy SH8: Recreation and leisure: this policy will encourage improving linkages to existing open space assets and green corridors, and support the delivery of the England Coast path through the Shoreham Harbour Regeneration Area. <p>The character area policies further address the mitigation of key junctions, again contributing to health objectives:</p> <ul style="list-style-type: none"> • Policy CA1: South Quayside: This policy will seek improvements to the lock gate crossing for the benefit of pedestrians and cyclists, and to to Basin Road South, National Cycle Route (NCN2) and Monarch’s Way public right of way. • Policy CA2: Aldrington Basin: Proposals will be expected to enhance townscape around key linkages and junctions, identify mechanisms for implementing ecological and landscaping improvements to embankments as part of the green corridor, and deliver the package of transport measures for Aldrington Basin as set out in the Shoreham Harbour Transport Strategy. • Policy CA3: South Portslade and North Quayside: Proposals will be expected to enhance townscape around key linkages and junctions, to support and identify mechanisms for implementing ecological and landscaping improvements frontage as part of the green corridor, new developments fronting Wellington Road should be setback beyond the proposed green corridor prevent a canyoning effect and ensure that residents are protected from noise and air quality impacts, and the partnership will work with developers and stakeholders to deliver the package of transport measures for North Quayside

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	<p>and South Portslade as set out in the Shoreham Harbour Transport Strategy.</p> <ul style="list-style-type: none"> • Policy CA4: Portslade & Southwick Beaches: The partnership will promote opportunities to improve the quality of the National Cycle Route No. 2 and Public Right Of Way corridor in accordance with the Transport Strategy. • Policy CA5: Fishersgate and Southwick: The partnership will support and identify mechanisms for implementing ecological and landscaping improvements as part of the green corridor along the A259, will work with developers and stakeholders to deliver the package of transport measures for Fishersgate & Southwick as set out in the <i>Shoreham Harbour Transport Strategy</i>, support the delivery of the Southwick Waterfront access road to create space for an access road and waterside footway / cycle path. • Policy CA7: Western Harbour Arm: Developments should be set back from the A259 corridor to prevent a canyoning effect and noise and air quality impacts, mechanisms for implementation ecological and landscaping improvements along the waterfront route and alongside Brighton Road (A259) to extend the green corridor will be supported, and the partnership will work with developers and stakeholders to deliver the package of transport measures for the Western Harbour Arm as set out in the Shoreham Harbour Transport Strategy.
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>	
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43) Local planning authorities should not impose a ban on new</p>	<p>The Shoreham Harbour regeneration area will not be affected or contain any communications infrastructure. However, as stated in paragraph 1.1.3 of the Joint area Action Plan “Planning applications within the regeneration area must comply with the strategy and policies in the JAAP, as well as the relevant local plans”. Owing to this, the</p>

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<p>telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<p>plan builds on and complements the following communications infrastructure policies of the local plans:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 37 Telecommunications • <i>Brighton & Hove City Plan Part One (2016)</i>: Clause 4. of CP2 Planning for Sustainable Economic Development
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>	
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<p>In setting out spatial strategies for Adur, including housing targets, the <i>Adur local Plan 2017</i> in Policy 8: Shoreham Harbour Regeneration Area outlines the housing targets for the Adur portion of the regeneration area, and the area priorities for the Adur character areas.</p> <p>In setting out spatial strategies for Brighton & Hove , including housing targets, the <i>Brighton & Hove City Plan Part One (2016)</i> in Policy DA8: Shoreham Harbour outlines the housing targets for the Brighton & Hove portion of the regeneration area, and the area priorities for the Brighton & Hove character areas.</p> <p>In terms of Adur and Brighton & Hove, the Joint Area Action Plan identifies allocations within the character areas to accommodate housing provision in accordance with the provisions of both Local Plans. These allocations are best placed to provide housing numbers while balanced against other factors, such as dwelling mixes, infrastructure provision, and existing with neighbouring port and employment uses, in line with the area wide policy SH4: Housing and community.</p> <p>Both Adur and Brighton & Hove have a demonstrable 5 year housing land supply as set out in the Council's respective Annual Monitoring Report and in more detail in the</p>

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	<p>SHLAA documents. These are discussed and considered in further detail in the accompanying Housing Topic Paper</p> <p>Evidence of planning applications being approved and already contributing to this target is discussed further in the accompanying <i>Delivery Topic Paper</i>.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<p>The Joint Area Action Plan will covers the period to 2032, delivering the minimum housing targets as set out in policy, in line with the <i>Adur Local Plan 2017</i> which is also until 2032.</p> <p>The identified allocations and character area will deliver the minimum policy targets over the plan period. Evidence of planning applications being approved and already contributing to this target is discussed further in the accompanying <i>Delivery Topic Paper</i>.</p> <p>The Councils have identified a supply of developable sites/ broad locations for years 6-10 and 11-15, in the respective SHLAA documents for Adur and Brighton & Hove. These are regularly monitored and updated.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<p>The Joint Area Action Plan identifies a number of sites to accommodate housing provision within the plan period to 2021.</p> <p>Annual monitoring, updated housing trajectories, and information of completions, is considered in the following ways:</p> <ul style="list-style-type: none"> • West Sussex County Council monitors housing delivery through new permissions, commencements and completions; this is reported through the Annual Monitoring Report, published every December.

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	<ul style="list-style-type: none"> • The Brighton & Hove City Council <i>SHLAA Update 2017</i> outlines the latest (2017) annual review of the council’s Strategic Housing Land Availability Assessment (SHLAA). It has been undertaken to incorporate the latest information regarding housing land supply in the city and to update the city’s housing trajectory. This has also recorded Sites gaining planning consent for housing in the year 2016/17. • The Adur SHLAA will be updated annually in December as part of the Councils Annual Monitoring Report. The <i>SHLAA 2017 Update</i> is available for viewing
<p>Set out the authority’s approach to housing density to reflect local circumstances (47).</p>	<p>The Western Harbour Arm Waterfront allocation has been identified as being able to promote higher densities on appropriate sites. In general buildings should be developed up to 5 storeys on the Brighton Road (A259) and River Adur frontages. Within deeper sites, heights could step up away from these frontages.</p> <p>The findings from the Objectively Assessed Need for Housing: Adur District study undertaken in 2015 identifies a limited demand for dwellings with four or more bedrooms. The focus of provision of market housing in Adur should be on two and three bedroom housing both for younger households and older households wishing to downsize. The provision of smaller dwellings should be focussed in and around town centres and Shoreham Harbour.</p> <p>At the Western Harbour Arm Waterfront there is an opportunity to provide a mix of properties, including one, two and three bedroom homes as part of a high density development.</p> <p>The accompanying <i>Delivery Topic Paper</i> states the approved planning permissions in</p>

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	<p>the Western Harbour Arm. This includes major residential developments which shows that even though they are large developments, their density will not have an adverse impact upon local circumstances.</p> <p>The <i>Western Harbour Tall Buildings Capacity Study (2017)</i> also considered building size and density. The study has identified a number of significant views that should be protected, and heritage assets that should be considered as part of development proposals.</p>
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<p>The following policies of the <i>Adur Local Plan 2017</i> and <i>Brighton & Hove City Plan Part One (2016)</i> sets out the level of housing, including proportion of affordable, to be provided in Adur, Brighton & Hove, and the regeneration area:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 20: Housing Mix and Quality and Policy 21: Affordable Housing. • <i>Brighton & Hove City Plan Part One (2016)</i>: CP19 Housing Mix, CP20 Affordable Housing <p>The Joint Area Action Plan has reflected these requirements in clause 3. of Policy SH4: Housing and community, which states that new residential development will be expected to make provision for a mix of affordable housing, including social rented, affordable rented and intermediate housing in accordance with local plan policies.</p> <p>The Joint Area Action Plan provides for a range of sites to accommodate housing needs, including affordable housing, through the allocations:</p> <ul style="list-style-type: none"> • Aldrington Basin (within CA2)

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	<ul style="list-style-type: none"> South Portslade (within CA3) Southwick Waterfront (within CA5) Western Harbour Arm Waterfront (within CA7) <p>Housing needs assessments for both Adur and Brighton & Hove have identified a shortfall in housing provision in relation to need, in particular affordable and family sized homes. Supporting the delivery of new housing areas is central to the vision of transforming the harbour into an attractive waterfront community. The Joint Area Action Plan will support the regeneration of a number of brownfield sites which have been identified as suitable for residential development, balanced with the protection of key employment sites in other parts of the harbour.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p>Not applicable.</p>
<p>7. Requiring good design (paras 56-68)</p>	
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<p>The Joint Area Action Plan’s polices and proposal provisions provide for detailed criteria to ensure that development is of a consistent quality, even across the distinct character areas. This is specifically reflected in the following policies, which consider landmark buildings/ important views and the waterfront:</p> <ul style="list-style-type: none"> Policy SH9: Place making and design quality: clause 1. states that schemes

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	<p>should be designed to reflect the character of the marine environment and should be sensitive to views of the waterfront, surrounding landscape and historic features.</p> <ul style="list-style-type: none"> • Policy CA2: Aldrington Basin: Building heights should be justified with regard to analysis of the local urban design context, orientation, sunlight and daylight impacts and apply high quality design principles. • Policy CA3: North Quayside and South Portslade: clause 8 states that Comprehensive redevelopment may offer potential for greater building heights, subject to consultations through the planning application process, detailed design considerations and meeting the principles of the emerging Urban Design Framework. • Policy CA7: Western Harbour Arm: states that taller buildings may be considered in the centre of the allocation (western portion of site WH3, site WH4 and eastern portion of site WH5).Proposals will be required to demonstrate an appropriate response and high quality design in relation to the following elements: <ul style="list-style-type: none"> ○ Scale and height ○ Architectural detailing ○ Materials ○ Public realm and open space

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	<ul style="list-style-type: none"> ○ Public transport accessibility ○ Views into and out of the area, including assessment of glimpse views, local views and long views in relation to the waterfront, local landmarks, the South Downs National Park, conservation areas, and historic assets ○ Microclimate impacts including wind, daylight and sunlight effects, air pollution and urban heat island effects. <p>This accords with the following local plan policies:</p> <ul style="list-style-type: none"> ● <i>Adur Local Plan 2017</i>: Vision 6 and Policy 15: Quality of the Built Environment and Public Realm, Policy 16: A Strategic Approach to the Historic Environment, Policy 17: The Historic Environment, and Policy 18: Sustainable Design ● <i>Brighton & Hove City Plan Part One (2016)</i>: CP12 Urban Design, CP13 Public Streets and Spaces, CP14 Housing Density, and CP15 Heritage. <p>The <i>Shoreham Harbour Streetscape Guide(2012)</i> provides more guidance on design related issues.</p>
<p>8. Promoting healthy communities (paras 69-77)</p>	
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe</p>	<p><i>An Equality and Health Appraisal of the Shoreham Harbour Joint Area Action Plan</i> has been carried out to provide an assessment of the impact of decisions relating to the</p>

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<p>and accessible environments; and are accessible developments (69).</p>	<p>Joint Area Action Plan on particular residents.</p> <p>The following Joint Area Action Plan policies seek to provide mixed use developments which promote community interaction, are safe and accessible, include pedestrian and cycle routes, and quality public spaces:</p> <ul style="list-style-type: none"> • Policy SH5: Sustainable travel: This requires a streetscape design to prioritise pedestrians and cyclists. • Policy SH7: Natural environment, biodiversity and green infrastructure: The partnership will work with stakeholders, developers, landowners and communities to deliver an improved green infrastructure network and open space. • Policy SH8: Recreation and leisure: Development proposals will be required to provide high quality multifunctional public open space / green infrastructure on site, improve linkages to existing open space assets and green corridors, the provision of appropriate measures to enhance watersports and other traditional coastal activities will be supported, major waterfront development schemes, are expected to incorporate features that improve open access to the waterfront, and The partnership will work with Natural England to support the delivery of the England Coast path through the Shoreham Harbour Regeneration Area. • Policy SH9: Place making and design quality: Clause 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

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<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<p>As part of predominantly mixed-use schemes, the Joint Area Action Plan provides for new pedestrian areas, shared cycle/pedestrian facilities, open space provision and community facilities in its policy areas and opportunity sites:</p> <ul style="list-style-type: none"> • Policy SH4: Housing and community: clause 4 development will be required to contribute towards provision of community and social infrastructure, in

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	<p>accordance with the relevant Infrastructure Delivery Plan.</p> <ul style="list-style-type: none"> • Policy SH5: Sustainable travel: development will be required to contribute towards the delivery of transport infrastructure which reduces congestion and increases the use of sustainable transport modes, development proposals must provide or contribute towards the delivery of a comprehensive and well integrated transport network, proposals that incorporate facilities and/ or initiatives to promote the use of the river as a means of transport, such as provision of pontoons and additional moorings will be encouraged. • Policy SH7: Natural environment: The partnership will promote and require the creation and enhancement of open space and green infrastructure • Policy SH8: Recreation and leisure: Brighton & Hove City Council and Adur District Council will work with developers to explore the role, function and more detailed design of green spaces as they come forward. These areas could help to meet local need for a range of open spaces including parks and gardens, amenity green space, provision for children and young people, outdoor sports facilities, allotments and community gardens. • Policy SH9: Placemaking and design quality: Waterfront development schemes are encouraged to incorporate features that improve public access, views and experience of the marine environment, development proposals should improve the quality, accessibility, security and legibility of public streets and spaces, all development proposals will be expected to embrace principles of good urban design. <p>These area wide policies apply to each of the seven character areas. Each character area policy builds on these, with more specific requirements regarding each character</p>

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<p><i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>	
	<p>area and allocation.</p> <p>These accord with the following local plan policies which seek to provide shared space, community facilities and other local services:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 33: Planning for Sustainable Communities, Policy 27: Retail, Town Centres and Local Parades, Policy 32: Open Space, Recreation and Leisure • <i>Brighton & Hove City Plan Part One (2016)</i>: CP4 Retail Provision, CP16 Open Space, CP13 Public Streets and Spaces
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<p>The seven character area policies of the Joint Area Action Plan build upon the area wide policies regarding open space, sports, and recreational facilities, identifying the areas of specific need that will provide and protect open space:</p> <ul style="list-style-type: none"> • Policy CA1: South Quayside: The partnership will seek Improvements to Basin Road South, National Cycle Route (NCN2) and Monarch’s Way public right of way • Policy CA2: Aldrington Basin: The partnership will work with developers and stakeholders to support and identify mechanisms for implementing ecological and landscaping improvements to embankments, contribute towards providing open space if this can’t be provided on development sites, and deliver the package of transport measures for Aldrington Basin as set out in the Shoreham

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	<p>Harbour Transport Strategy.</p> <ul style="list-style-type: none"> • Policy CA3: North Quayside and South Portslade: proposals will be expected to enhance townscape around key linkages and junctions, support and identify mechanisms for implementing ecological and landscaping improvements, New developments fronting Wellington Road should be setback beyond the proposed green corridor, contribute towards providing open space and the green corridor if this can't be provided on development sites, and deliver the package of transport measures for Aldrington Basin as set out in the Shoreham Harbour Transport Strategy. • Policy CA4: Portslade & Southwick Beaches: The beach areas and adjacent public spaces will be safeguarded for the enjoyment of local communities and visitors, The partnership will promote and deliver the enhancement and creation of vegetated shingle habitats to create a continuous corridor along the beaches, The partnership will promote opportunities to improve the quality of the National Cycle Route No. 2 and Public Right Of Way corridor, The partnership will work with Natural England to support the delivery of the England Coast path. • Policy CA5: Fishersgate and Southwick: The partnership will support and identify mechanisms for implementing ecological and landscaping improvements, deliver the package of transport measures for Fishersgate & Southwick as set out in the <i>Shoreham Harbour Transport Strategy</i>.

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	<ul style="list-style-type: none"> <i>Adur Local Plan 2017: Open Space Study (2014), Playing Pitch Assessment (2014) and Indoor Sports Facilities Assessment (2013)</i> is the most up-to-date statement of existing deficits and surpluses. Policy 32: Open Space, Recreation and Leisure of the <i>Adur Local Plan 2017</i> requires major development for residential use to provide open space on site in accordance with the Council’s adopted standards, agreed by the Joint Strategic Committee on 2nd December 2014. <i>Brighton & Hove City Plan Part one (2016)</i>: Policy CP16 Open Space aims to safeguard, improve, expand and promote access to Brighton & Hove’s open spaces (public and private) and the diverse range of experiences offered by these spaces. Clause 1. States: “The council will require the retention of and seek better, more effective and appropriate use of all existing open space, as shown on the policies map, having regard to the Open Space, Sports and Recreation Study and the Open Space Update Study.” <p>These studies and relationship to their respective Local Plans are considered and discussed further in the accompanying <i>Green Infrastructure Topic Paper</i>.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<p>The Joint Area Action plan has identified areas as a “village green”. Kingston Beach and The Ham are registered as village greens. This safeguards these areas as public spaces.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>	
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and</p>	<p>The Joint Area Action Plan is predominantly an urban location and does not have any designated Green Belt land within its boundaries.</p>

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<p>recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>	
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<p>The Heat Network Delivery Unit (HNDU)¹ 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. The <i>Shoreham Harbour District Energy Feasibility Study</i> (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.</p> <p>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.</p> <p>The Joint Area Action Plan reiterates the heat network importance in the following</p>

¹ HNDU is now part of the Department for Business, Energy and Industrial Strategy (BEIS). It was formerly part of the Department for Energy and Climate Change (DECC), which was abolished in 2016.

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	<p>proposed policy modifications:</p> <ul style="list-style-type: none"> • Policy SH1: Climate change, energy and sustainable building (proposed cause 6): The councils will support the development of district heat networks and associated infrastructure, in areas identified in the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i>. • Policy CA6: Harbour Mouth (proposed clause 9): The council will support the development of infrastructure to deliver the Shoreham Heat Network. • Policy CA7 Western Harbour Arm (proposed clause 4): The council 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. <p>The following Local Plan policies are also present regarding renewable energy and district heat networks:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 19: Decentralised Energy, Stand-alone Energy Schemes and Renewable Energy. This aims to ensure that where viable and feasible, commercial and residential developments in areas identified in the <i>Shoreham Harbour Heat Network Study (2015)</i> will be expected to connect to district heating networks where they exist. • <i>Brighton & Hove City Plan Part One (2016)</i> Policy CP8 Sustainable Buildings. Paragraph 3.113 states that The Brighton & Hove Energy Study has identified particular potential for District Heating networks in and around Shoreham Harbour within a long list of priority areas. Development within the long-list of priority areas will be encouraged to consider low and zero carbon

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	<ul style="list-style-type: none"> <i>Adur Local Plan 2017: Policy 36: Flood Risk and Sustainable Drainage.</i> <i>Brighton & Hove City Plan Part One (2016): Policy CP11 Managing Flood Risk.</i>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<p>Paragraph 97 of the NPPF states that local planning authorities should design policies to maximise renewable and low carbon development, and identify suitable areas for renewable and low carbon energy sources. Shoreham Harbour Regeneration Partnership, Adur District Council, West Sussex County Council and Shoreham Port Authority have formed the Shoreham Heat Network Partnership.</p> <p>The Joint Area Action Plan will deliver renewable energy through a district heat network, through the following proposed policy modification:</p> <ul style="list-style-type: none"> Clause 6. of Policy SH1: Climate change, energy and sustainable building: The councils will support the development of district heat networks and associated infrastructure., in areas identified in the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> <p>As stated in a proposed modification to paragraph 3.1.16 of the Joint Area Action Plan, 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. 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. The Old Customs House on</p>

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	<p>Schemes and Renewable Energy: This policy requires major development applications to contain an assessment of providing new heat network opportunities, the feasibility of connecting to existing networks, and potential expansion of existing networks. This policy also states that where viable and feasible, commercial and residential developments in areas identified in the <i>Shoreham Harbour Heat Network Study (2015)</i> will be expected to connect to district heating networks where they exist.</p> <ul style="list-style-type: none"> • <i>Brighton & Hove City Plan Part One (2016)</i> - Policy DA8 the city council is proactively encouraging opportunities that arise to incorporate waste heat or other heat sources into the heat networks for the city. The <i>Brighton & Hove Energy Study (2013)</i> identified the potential for district heating networks in and around Shoreham Harbour within a long list of priority areas.
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<p>The Joint Area Action Plan contains the following policies that aim to minimise vulnerability to climate change and flood risk:</p> <p>Policy SH1: Climate change and renewable energy: A completed Sustainability Checklist will be required to accompany all development proposals in the areas of the harbour within Brighton & Hove. A Sustainability Statement will be required to accompany all development proposals within Adur. Development should achieve zero carbon status where feasible by incorporating passive design measures.</p> <p>Policy SH6: Flood risk and sustainable drainage: Development proposals in the</p>

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	<p>The Joint Area Action Plan accord with the following Local Plan policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017: Policy 36: Flood Risk and Sustainable Drainage</i> • <i>Brighton & Hove City Plan Part One (2016): Policy CP11 Flood Risk</i>
<p>Take account of marine planning (105)</p>	<p>The <i>South Inshore Marine Plan</i> includes the coastline at Shoreham Beach, and Southwick and Portslade-by-Sea. It also includes the Eastern and Western Arms of the River Adur. This is reflected in the following policies:</p> <p>Policy SH6: Flood risk and sustainable development: All proposed flood defences, flood defence upgrades, slipways, pontoons and floodgates will require prior approval of the Environment Agency, either through the Environment Agency Permit or as part of the Marine Management Organisation license.</p> <p>Policy SH8: Recreation and leisure: Major waterfront development schemes, are expected to incorporate features that improve open access to the waterfront. Early consultation with Shoreham Port Authority and statutory bodies such as the Environment Agency and Marine Management Organisation is advised.</p> <p>Regarding the Local Plans, the MMO sought modifications to previous versions of the Adur Local Plan, which were taken into account through modifications.</p> <p>The Marine Management Organisation will be preparing a marine plan for the south coast of England which will inform and guide marine users and regulators and seek to manage the sustainable development of marine industries such as wind farms, shipping, marine aggregates and fishing alongside the need to conserve and protect marine species, habitats and leisure uses. Where appropriate, regard will be had to the</p>

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	<p>marine plan in Part 2 of the Brighton & Hove City Plan.</p>
<p>Manage risk from coastal change (106)</p>	<p>The Joint Area Action Plan has taken account of the following documents:</p> <ul style="list-style-type: none"> • <i>Brighton Marina to River Adur Coastal Strategy Study</i>: This document examines how the stretch of coastline between Brighton Marina and the River Adur (up to the Canal lock gates in Southwick) will change over the next 100 years, identifying erosion and flood mitigation measures. Proposed flood defence improvements identified in this strategy would enhance the standard of protection for allocated sites identified in this plan, such as Southwick Waterfront and Aldrington Basin. The proposals identified in the strategy are therefore fully supported by the Partnership. • <i>Rivers Arun to Adur Flood and Erosion Management Strategy (2010)</i>: This strategy includes a large part of the River Adur taking in the Western Harbour Arm. <p>Policy SH6: Flood risk and sustainable drainage will manage flood risk from coastal change. A proposed modification to clause 1. of this policy has added in that “The partnership will support the delivery of measures to mitigate flood risk and coastal erosion in the regeneration area.”</p> <p>The Adur Local Plan was also informed by the <i>Rivers Arun to Adur Flood and Erosion Management Strategy (2010)</i>.</p> <p>The <i>Brighton & Hove City Plan Part One (2016)</i> states that The ‘Brighton Marina to River Adur Strategy’ recommends the maintenance of existing coastal defences with some enlargement of groynes and beaches in the King Alfred area and a scheme to upgrade defences between the western end of Hove Lagoon and the River Adur</p>

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	<p>through Shoreham Port. The Strategy is being revised following advice and funding from Defra. In Brighton & Hove the long term management of coastal flood risk and erosion is set out within the <i>Beachy Head to Selsey Bill Shoreline Management Plan (SMP)</i>. The Shoreline Management Plan for the coastline west of the marina proposes to continue to 'hold the line' in terms of coastal defence.</p>
<p>11. Conserving and enhancing the natural environment (paras 109-125)</p>	
<p>Protect valued landscapes (109)</p>	<p>The partnership is currently preparing a <i>Green Infrastructure Strategy</i>. This will set out proposals for ecological enhancements throughout the regeneration area as well as the creation of a green corridor as part of an enhanced green infrastructure network. Urban greening measures, including soft landscaped open space, tree planting, green roofs and walls, which will form part of the wider green infrastructure in Shoreham Harbour, are promoted in the following policies:</p> <ul style="list-style-type: none"> • Policy SH7: Natural environment, green infrastructure, and biodiversity: This policy requires development to accord with the Green Infrastructure Strategy that will identify implementation mechanisms for the regeneration area, that the partnership will work with developers to deliver a green infrastructure network and green corridor, and green infrastructure must be suitable for a coastal location in line with the <i>Shoreham Harbour Streetscape Guide (2012)</i>. This policy contains a proposed modification to clause four which states all development applications must be accompanied by up to date ecological information. • Policy SH8: Recreation and leisure: Development proposals will be required to provide high quality multifunctional public open space / green infrastructure

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	<p>on site, in line with the <i>Green Infrastructure Strategy</i>, and link open spaces and green corridors.</p> <ul style="list-style-type: none"> • Policy CA2: Aldrington Basin: 9. The partnership will work with developers and stakeholders to support and identify mechanisms for implementing ecological and landscaping improvements to embankments, including the green corridor • Policy CA3: North Quayside and South Portslade: New buildings should be set back from Wellington Road to allow the enhancement and extension of the proposed green corridor. • Policy CA5: Fishersgate and Southwick: The partnership will support Adur Homes, Action Eastbrook Partnership and local service providers to promote opportunities to support communities in improving green infrastructure to provide amenity to residents and enhance biodiversity, and identify landscaping improvement including the green corridor. • Policy CA6: Harbour Mouth: The partnership will work with the community and stakeholders to upgrade of public open space areas in accordance with the Shoreham Harbour Streetscene Guidance and <i>Shoreham Harbour Green Infrastructure Strategy</i>, and streetscape planting to improve the green corridor. • Policy CA7: Western Harbour Arm: The partnership will support and identify mechanisms for implementation ecological and landscaping improvements along the waterfront route and alongside Brighton Road (A259) to extend the green corridor. The new waterfront route must incorporate sustainable drainage features, such as permeable surfacing and incorporating suitable trees and vegetation.

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	<p>The requirement of a “net gain” in biodiversity is in line with the government document 'A Green Future: Our 25 Year Plan to Improve the Environment'</p> <p>The policies also accord with the following Local Plan policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 13: Adur’s Countryside and Coast, Policy 14: Local Green Gaps, Policy 30: Green Infrastructure • <i>Brighton & Hove City Plan Part One (2016)</i>: CP14 Housing Density, CP10 Biodiversity, CP16 Open Space
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<p>The Joint Area Action Plan contains the following policies regarding mitigating pollution:</p> <p>Policy SH6: Flood risk and sustainable development: Proposals should demonstrate how the risks of surface water runoff and water pollution have been reduced including through the introduction of sustainable drainage systems (SuDS) and water capture/recycling technology.</p> <p>Policy SH7: Natural environment, biodiversity and green infrastructure: Pollution control measures will be required to deal with surface water run-off where this is discharging straight into the River Adur or the Canal, especially where waterside vehicular access is promoted.</p>

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	<p>The policies also accord with the following Local Plan Policies:</p> <ul style="list-style-type: none"> • Adur Local Plan 2017: Policy 34: Pollution and Contamination, and Policy 35: Water Quality and Protection • Brighton & Hove City Plan Part One (2016): CP8 Sustainable Buildings, CP10 Biodiversity
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<p>Policy SH7: Natural environment, green infrastructure, and biodiversity: This policy considers biodiversity in the following proposed modifications:</p> <ul style="list-style-type: none"> • Clause 4. All development applications must be accompanied up to date ecological information to ensure no net loss, and seek to provide a net gain to biodiversity. • Clause 7. Where impacts on biodiversity cannot be avoided or mitigated, compensatory actions measures will be required, taking account of an up-to-date ecological survey. Like-for-like compensatory habitat should be provided at or close to the site, subject to agreement with the relevant authorities, including Natural England the Environment Agency. <p>Policy CA5: Fishersgate and Southwick: The partnership will support Adur Homes, Action Eastbrook Partnership and local service providers to Promote opportunities to support communities in improving green infrastructure to provide amenity to residents and enhance biodiversity.</p>

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	<p>Policy CA6: Harbour Mouth: The partnership will work with the community and stakeholders to improve Kingston Beach including promoting opportunities for interpretation of marine environment and biodiversity.</p> <p>As a Joint Area Action Plan, the biodiversity benefits to be delivered will result in significant improvements across the boundary of Adur and Brighton & Hove. This will include the creation of a green corridor and public access routes, to enhance biodiversity and recreation over a large area across the two authorities.</p> <p>The policies also accord with the following Local Plan Policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017: Policy 30 Green Infrastructure, Policy 31 Biodiversity</i> • <i>Brighton & Hove City Plan Part One (2016): CP10 Biodiversity, CP16 Open Space</i>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>	
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<p>The <i>Western Harbour Tall Buildings Capacity Study (2017)</i> has identified a number of significant views that should be protected, and heritage assets that should be considered as part of development proposals, including the Grade II Listed Kingston Buci lighthouse signalling the entrance to the harbour. This is reflected in the following policy:</p> <p>Policy CA7: Western Harbour Arm: Taller buildings may be considered in the centre of the allocation (western portion of site WH3, site WH4 and eastern portion of site WH5). Proposals will be required to demonstrate an appropriate response and high quality design in relation to Views into and out of the area, including assessment of glimpse views, local views and long views in relation to the waterfront, local landmarks,</p>

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	<p>the South Downs National Park, conservation areas, and historic assets.</p> <p>The Policies Maps of the Joint Area Action Plan includes the planning constraints to be taken into account, such as the Listed building and scheduled monuments.</p> <p>The Joint Area Action Plan also accords with the following Local Plan policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan (2017)</i> Policy 15: Quality of the Built Environment and Public Realm, Policy 16: A Strategic Approach to the Historic Environment, Policy 17: The Historic Environment • <i>Brighton & Hove City Plan Part One (2016)</i>: CP15 Heritage, CP8 Urban Design, CP13 Public Streets and Spaces
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>	
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>In order to ensure that sufficient minerals capacity is retained at the harbour, Adur District Council has signed a <i>Statement of Common Ground (SoCG)</i> (2016) with West Sussex County Council, Brighton & Hove City Council, Shoreham Port Authority, and the neighbouring mineral planning authorities (East Sussex County Council and South Downs National Park Authority).</p> <p>The councils consider that the wider regeneration benefits, provision of new housing and employment floorspace justify the release of the minerals wharves on the Western Harbour Arm. Partnership work is continuing with West Sussex County Council and Brighton & Hove City Council to ensure that sufficient wharfage is safeguarded at the port. The accompanying <i>Mineral Wharves Topic Paper</i> discusses this in more detail,</p>

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	<p>and how the Joint Area Action Plan complies with the safeguarding policies of the <i>West Sussex Joint Minerals Local Plan (2017)</i> and the <i>East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (adopted 2017)</i>.</p> <p>The Joint Area Action Plan will support the safeguarding of the important function of Shoreham Port, including the importing and handling of aggregates and minerals. Several policies in the Joint Area Action Plan contain information regarding safeguarding:</p> <p>Policy SH2: Shoreham Port: Parts of the harbour as identified within this plan will be safeguarded for port operational uses and will be the focus for commercial port activity. Non-port related activities will be resisted in those areas.</p> <p>Policy CA1: South Quayside: South Quayside is safeguarded for future commercial port activity and for the relocation of existing port operators from elsewhere in the harbour. With the exception of the existing power stations, and waste water treatment plant, non-port operations are not permitted in this area.</p> <p>Policy CA2: Aldrington Basin: Port operational areas are safeguarded for commercial port operations and related activities.”</p> <p>Policy CA3: North Quayside and South Portslade: North Quayside is safeguarded for future commercial port operations and related activities.</p> <p>Policy CA5: Southwick Waterfront: Port operational areas, including the dry dock, are safeguarded for future commercial port operations and related activities.</p> <p>Policy CA6: Harbour Mouth: The existing port operational areas will be safeguarded for future commercial port activity.</p>

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	<p>The Joint Area Action Plan also accords with Policy CP3 Employment Land of the <i>Brighton & Hove City Plan Part One</i> (2016), which states certain employment uses must comply with the relevant waste and minerals plan.</p>
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The <i>Consultation Statement</i> for the Shoreham Harbour Joint Area Action Plan explains the role of consultation in developing the plan.</p> <p>Publication is carried out in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, and the adopted Statement of Community Involvement (SCI) for each of the three partner authorities: Adur District Council, Brighton & Hove City Council and West Sussex County Council. These documents are available from the planning policy pages of each council's website. Each <i>Statement of Community Involvement</i> sets out the minimum requirements for consultation on local plans such as the Joint Area Action Plan.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>The Partnership has published a list of key documents and evidence base studies that have informed the Joint Area Action Plan by theme on the Adur and Worthing Councils website.</p> <p>At each relevant stage in the production of the Joint Area Action Plan a <i>Consultation Statement</i> has been published outlining previous comments raised on the Joint Area Action Plan together with a response setting out how these comments were to be taken into account.</p> <p>At each stage of the process, <i>the Sustainability Appraisal (SA)</i> was reviewed. The recommendations of the SA informed the preparation and subsequent amendment/review of the Joint Area Action Plan's policies and proposals to ensure</p>

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	<p>they promoted sustainable development. The SA process assessed reasonable alternative options and detailed the evolution of each policy. Respective SA's were published alongside each stage of the Joint Area Action Plan preparation process for comment.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>As above.</p>
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>The Adur Local Development Scheme (LDS) 2016-18 sets out the timetable for the production of documents which will form part of the Adur Local Development Framework. The LDS addresses Development Plan Documents (including the Adur Local Plan and the Shoreham Harbour Joint Area Action Plan) which will set policies for the area as well as Supplementary Planning Documents, which will provide further detail on specific policy issues.</p> <p>Brighton & Hove's most up to date Local Development Scheme for 2017-2020 was approved by the council on 21 September 2017.</p> <p>Statutory Agencies eg Highways Agency, Environment Agency have been involved/</p>

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	<p>engaged throughout the production of the Joint Area Action Plan. They have also had the opportunity to comment on the Sustainability Appraisal. Their comments on the Plan’s vision, objectives and policies have been incorporated as far as possible. See also representations on the Joint Area Action Plan.</p> <p>The “Delivery and implementation” section of the Joint Area Action Plan discusses delivery, implementation and monitoring of the Plan. This has further been considered in the <i>Delivery Topic Paper</i>.</p> <p>The Sustainability Appraisal presents a description of the measures envisaged concerning monitoring. These monitoring indicators will be finalised and confirmed in the SA/SEA Post Adoption Statement.</p> <p>The Vision and Objectives of the Joint Area Action plan are clearly stated in Section 2. Spatial strategy; the policies have been developed to flow from these. Each objective has its own corresponding area-wide policy. Regarding the character area policies, these flow from the corresponding area priorities for each character area. It is not considered that there are any obvious ‘policy gaps’.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<p>Infrastructure provision is considered in the following Joint Area Action Plan policy:</p> <ul style="list-style-type: none"> • Policy SH10: Infrastructure Requirements: Developers will be required to provide or contribute towards infrastructure, prior to any part of the development becoming operational or being occupied. Infrastructure needs are identified in each local authority’s <i>Infrastructure Delivery Plan (IDP)</i>. <p><i>A Whole Plan Viability and Deliverability Study for Adur District Council was produced</i></p>

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	<p>by Adams Integra in January 2018, to support the Joint Area Action Plan. Paragraph 12.19 states that in respect of CIL, neither Brighton & Hove nor Adur have adopted a CIL charging scheme, as at the date of this report. The report has not made any allowances for a CIL charge in assessments of the potential development sites.</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<p><i>Infrastructure Delivery Plans (IDPs)</i> have been drafted for Adur and Brighton & Hove. These are live documents that set out the infrastructure priorities associated with the implementation of the Adur Local Plan 2017 and Brighton & Hove City Plan Part One (2016) and include requirements for Shoreham Harbour. The IDPs clarify which organisation/s are responsible for delivering the infrastructure, how it will be funded and when it is required. The Joint Area Action Plan references these IDPs in the following policy:</p> <ul style="list-style-type: none"> • Policy SH10: Infrastructure requirements: Clause 2. states that Infrastructure must be provided at the appropriate time, prior to any part of the development becoming operational or being occupied. Infrastructure needs are identified in each local authority's Infrastructure Delivery Plan (IDP). <p>The Joint Area Action Plan contains Maps that show the character areas and allocations for then regeneration area and each character area. This effectively communicates where the character areas will deliver the various elements of the vision, objectives, and area priorities. The accompanying <i>Delivery Topic Paper</i> demonstrates the permissions already approved for housing. The paper then balances these against approved applications providing employment space, and environmental benefits, showing a commitment to delivering sustainable development. This has been achieved through the seven distinct character areas, meeting the priorities for each area and responding to the different opportunities presented in each area</p>

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	<p>through planning permissions.</p> <p>In setting out spatial strategies for Adur , including housing and employment space targets, the <i>Adur Local Plan 2017</i> in Policy 8: Shoreham Harbour Regeneration Area outlines these targets for the Adur portion of the regeneration area, and the area priorities for the Adur character areas.</p> <p>In setting out spatial strategies for Brighton & Hove , including housing and employment space targets, the <i>Brighton & Hove City Plan Part One (2016)</i> in Policy DA8: Shoreham Harbour outlines these targets for the Brighton & Hove portion of the regeneration area, and the area priorities for the Brighton & Hove character areas.</p> <p>In terms of Adur and Brighton & Hove, the Joint Area Action Plan identifies allocations within the character areas to accommodate housing and employment space provision in accordance with the provisions of both Local Plans. These allocations are best placed to provide housing numbers while balanced against other factors, such as dwelling mixes, infrastructure provision, and existing with neighbouring port and employment uses, in line with the area wide policy SH4: Housing and community.</p> <p>The <i>Duty to Co-operate Statement</i> also refers to wider than local issues.</p> <p>A wide variety of agencies, including infrastructure providers have been consulted, and kept informed of the Local Plan throughout its development. (See <i>Consultation Statement</i>).</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or 	<p>The <i>Sustainability Appraisal</i> also refers to issues/effects which require monitoring.</p>

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<p>unexpected changes in, circumstances?</p> <ul style="list-style-type: none"> • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>The “Delivery and implementation” section of the Joint Area Action Plan discusses delivery, implementation and monitoring of the Plan. This has further been considered in the accompanying <i>Delivery Topic Paper</i>.</p> <p>Annual monitoring, updated housing trajectories, and information of completions, is considered in the following ways:</p> <ul style="list-style-type: none"> • West Sussex County Council monitors housing delivery through new permissions, commencements and completions; this is reported through the <i>Annual Monitoring Report</i>, published every December. • The Brighton & Hove City Council <i>SHLAA Update 2017</i> This report outlines the latest (2017) annual review of the council’s <i>Strategic Housing Land Availability Assessment</i> (SHLAA). It has been undertaken to incorporate the latest information regarding housing land supply in the city and to update the city’s housing trajectory. This has also recorded Sites gaining planning consent for housing in the year 2016/17. • The Adur <i>SHLAA</i> will be updated annually in December as part of the Councils Annual Monitoring Report. The <i>SHLAA 2017 Update</i> is available for viewing.
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? 	<p>The <i>Duty to Cooperate Statement</i> has been prepared by the Shoreham Harbour Regeneration Partnership in order to outline how the Duty to Cooperate has been addressed in the production of the Proposed Submission Shoreham Harbour Joint Area Action Plan (JAAP). The Shoreham Harbour Regeneration Partnership is made up of Adur District Council, Brighton & Hove City Council, West Sussex County Council and</p>

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Soundness Test and Key Requirements	Evidence Provided
<p><i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>	
<p>Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</p>	<p>Shoreham Port Authority.</p> <p>The Shoreham Harbour Regeneration Partnership consider that the Duty to Cooperate has been fulfilled in relation to the preparation of the Shoreham Harbour JAAP and that there are no cross boundary issues arising from the document that have not been addressed through higher level strategic documents, local plans, other development plan documents or through the joint production of the Joint Area Action Plan as set out within the statement.</p> <p>The Joint Area Action plan is a local plan for the Shoreham Harbour Regeneration Area. It sets out a detailed and localised planning policy framework to guide development and forms part of the development plan alongside the Brighton & Hove City Plan and Adur Local Plan as relevant. Partnership working helps to ensure the Joint Area Action Plan and the Shoreham Port Masterplan, prepared by Shoreham Port Authority, complement one another.</p> <p>A Leaders' Board consisting of the Leaders of the three local authorities (or delegated representative) and a representative from Shoreham Port Authority was set up with overall responsibility for overseeing the Shoreham Harbour Regeneration project. Reporting to the Leaders' Board, is a Project Board consisting of senior officers from the three authorities and the Port Authority. A Planning Sub-Group consisting of planning officers from all three local authorities along with a representative from the Environment Agency, report to the Project Board. It oversaw the preparation of the Interim Planning Guidance and Development Briefs. The two Boards and Planning Sub-Group have held quarterly meetings to steer and inform the production of the Joint Area Action Plan and to keep relevant members and officers informed of key issues and progress. In addition to this a Flood Risk Sub-Group and a Transport Sub-Group were set up and met as relevant to appropriately address respective matters.</p> <p>Shoreham Port is an important site for importing minerals such as sand and gravel into</p>

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Soundness Test and Key Requirements	Evidence Provided
<p><i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>	
	<p>the local area. In 2016 Adur, Brighton & Hove, East Sussex and West Sussex councils, the South Downs National Park Authority and Shoreham Port Authority signed a <i>Statement of Common Ground</i> on minerals and wharves at the harbour. This aims to ensure the provision and safeguarding of adequate capacity for the import of minerals and aggregates. Strategic policies and waste and minerals site allocations are addressed within the respective Waste and Minerals Local Plans.</p> <p>Feedback received during the consultations in 2014 and 2016/17 on the Shoreham Harbour Joint Area Action Plan was considered and amendments to the plan made where appropriate, with every effort having been taken to reach an agreed outcome on those key issues raised as part of the engagement/consultation process.</p> <p>The accompanying <i>Delivery topic Paper</i> considers both housing and employment space, highlighting the planning permissions approved, and the contribution this has made to the Joint Area Action Plan policies. The <i>Delivery Topic Paper</i> provides these figures for the whole regeneration area, both Adur and Brighton & Hove respectively, and for each character area. This shows how the policies are being delivered across the boundary of Adur and Brighton & Hove, justifying the Shoreham Harbour Regeneration Partnerships' approach to the duty to cooperate.</p> <p><i>Infrastructure Delivery Plans</i> (IDPs) have been drafted for Adur and Brighton & Hove. These are live documents that set out the infrastructure priorities associated with the implementation of the <i>Adur Local Plan 2017</i> and <i>Brighton & Hove City Plan Part One (2016)</i> and include requirements for Shoreham Harbour. The IDPs clarify which organisation/s are responsible for delivering the infrastructure, how it will be funded and when it is required. The Joint Area Action Plan references these IDPs in the following policy:</p> <ul style="list-style-type: none"> • Policy SH10: Infrastructure requirements: Clause 2. states that Infrastructure must be provided at the appropriate time, prior to any part of the

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Soundness Test and Key Requirements	Evidence Provided
<p><i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>	
	<p>development becoming operational or being occupied. Infrastructure needs are identified in each local authority's <i>Infrastructure Delivery Plan (IDP)</i>.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<p>The "Delivery and implementation" section of the Joint Area Action Plan discusses delivery, implementation and monitoring of the Plan. This has further been considered in the accompanying <i>Delivery Topic Paper</i>.</p> <p>Section 38 of the <i>Sustainability Appraisal</i> proposes the monitoring framework. In the current report, there is a need to present 'a description of the measures envisaged concerning monitoring' only. These monitoring indicators will be finalised and confirmed in the <i>SA/SEA Post Adoption Statement</i>. Therefore, the indicators proposed may change at a subsequent stage.</p> <p>This is presented in a monitoring table which includes targets for each of the strategic objectives of the Joint Area Action Plan, and indicators for each target. These are encompassed within the proposed monitoring indicators table in page 73 of the <i>Sustainability Appraisal</i>: https://www.adur-worthing.gov.uk/media/media,146776,en.pdf</p>
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<p>The councils consider that the Joint Area Action Plan policies reflect local priorities and a robust and up to date evidence base. The councils consider that the Joint Area Action Plan policies do not duplicate provisions set out in national policy and where appropriate, the policies and supporting text refer to the NPPF.</p> <p>The Joint Area Action Plan addresses the housing shortfalls for both Adur and Brighton & Hove. The Joint Area Action Plan gives the OAN for both Adur and Brighton & Hove, states how each OAN cannot be met, and provides the housing targets for each plan.</p>

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Soundness Test and Key Requirements	Evidence Provided
<p><i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>	
	<p>Objective 4. Housing and community considers the issues of housing shortfalls. This states “To address shortfalls in local housing provision 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><i>The Consultation Statement</i> (November 2017) includes a summary of the main issues raised during earlier public consultations on the Draft Joint Area Action Plan, and the amendments to be made to the plan. Section 4. Of the statement lists the main amendments to the Joint Area Action Plan. Minor typographic errors and factual updates were not included.</p> <p>The Policies Maps for Adur and Brighton & Hove will be amended to reflect the proposals in the Shoreham Harbour Joint Area Action Plan.</p> <p><i>The Consultation Statement</i> refers to issues raised and includes summaries of representations made to both regulation 19 publication documents – and brief responses to these. It also addresses the consultations held under Regulation 18.</p>

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Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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Policy Expectations	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)	
Early and effective community engagement with both settled and traveller communities.	<p>As a Joint Area Action Plan for a regeneration area, there are no traveller sites. However, as the Joint Area Action Plan is consistent with the <i>Adur Local Plan 2017</i> and the <i>Brighton & Hove City Plan Part One (2016)</i>, it will accord with the respective traveller site policies of each plan, and the approaches in each authority.</p> <p>Adur: In 2012 the four Coastal West Sussex Authorities (Adur, Arun Worthing and Chichester) together with the South Downs National Park Authority and with support from West Sussex County Council jointly commissioned the <i>Coastal West Sussex Authorities Gypsy and Traveller and Travelling Showpeople Accommodation Assessment</i>. This sets out the accommodation needs of the travelling community for the fifteen year period 2011 and 2027.</p> <p>Brighton & Hove: Early and effective engagement with traveller communities and settled population undertaken as part of preparing <i>Traveller Commissioning Strategy (2012)</i>; <i>Accommodation Needs Assessment work</i>. (2005 GTAA and South East Plan Partial Review Process 2007 – 2010); site search exercises and ongoing liaison work.</p>
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<p>Adur: <i>The Coastal West Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2013</i>, together with an Update in 2014 provided an assessment of the needs of Gypsies, Travellers and Travelling Showpeople up to 2027. The methodology included consultation with other neighbouring planning authorities.</p> <p>Brighton & Hove: <i>East Sussex and Brighton & Hove Gypsy and Traveller Study 2005</i> and <i>South East Plan Partial Review Process (2007 – 2010)</i> involved joint working between neighbouring authorities and effective engagement with travellers regarding accommodation needs. This work established the need for 16 permanent pitches by 2016. <i>Traveller Commissioning Strategy (2012)</i> involved extensive engagement with</p>

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Policy Expectations	Evidence Provided
	<p>city's traveller communities and local support groups.</p> <p>Policy CP22 in of the <i>Brighton & Hove City Plan Part One</i> (2016) acknowledges the need for a further needs assessment exercise to update needs position and to establish needs over full plan period to 2030.</p>
Policy B: Planning for traveller sites (paras 7-11)	
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>The Local Plans contain the following policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 23: Provision for Gypsies, Travellers and Travelling Showpeople, and Policy 24: Safeguarding Existing Gypsy, Traveller and Travelling Showpeople Sites • <i>Brighton & Hove City Plan Part One</i> (2016) Policy CP22 Traveller Accommodation
Policy C: Sites in rural areas and the countryside (para 12)	
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>	<p>As above.</p>
Policy D: Rural exception sites (para 13)	
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.</p>	<p>N/a</p>

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Policy Expectations	Evidence Provided
Policy E: Traveller sites in Green Belt (paras 14-15)	
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	N/a. There is no Green Belt land within the regeneration area.
Policy F: Mixed planning use traveller sites (paras 16-18)	
<p>Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.</p>	<p>The Local Plans contain the following policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 23: Provision for Gypsies, Travellers and Travelling Showpeople, and Policy 24: Safeguarding Existing Gypsy, Traveller and Travelling Showpeople Sites • <i>Brighton & Hove City Plan Part One (2016)</i> Policy CP22 Traveller Accommodation
Policy G: Major development projects (para 19)	
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	As above.

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Integration of marine and terrestrial planning

As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

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The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all² public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions³

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

² Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

³ For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

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Policy Expectations	Evidence Provided
<p>Consistency between marine and terrestrial policy documents and guidance</p>	<p>The Marine Management Organisation (MMO) is a statutory consultee. As a stakeholder the MMO has been kept informed of progress on the Joint Area Action Plan.</p> <p>Paragraph 5.1.8 of the Joint Area Action Plan states that current partnership work supporting delivery includes close working and engagement with key government agencies including Environment Agency, Highways England, Natural England and the Marine Management Organisation.</p> <p>In the most recent consultation, the Marine Management Organisation did not submit any representations regarding the Joint Area Action Plan.</p> <p>The Marine Management Organisation is preparing the <i>South Inshore Marine Plan</i>. This covers the south coast and tidal rivers between Folkestone and the River Dart, Devon.</p> <p>Marine plans and local plans overlap between high and low water marks. The <i>South Inshore Marine Plan</i> includes the coastline at Shoreham Beach, and Southwick and Portslade-by-Sea. It also includes the Eastern and Western Arms of the River Adur.</p>
<p>Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages</p>	<p>As above</p>
<p>Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions</p>	<p>As above</p>
<p>Sections 2.1 -2.2: The UK vision for the</p>	

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Policy Expectations	Evidence Provided
marine environment	
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<p>Paragraph 1.9.12 of the Joint Area Action Plan highlights the UK Marine Policy Statement. This paragraph states that "The <i>UK Marine Policy Statement (2011)</i> sets out the government's vision for 'clean, healthy, safe, productive and biologically diverse oceans and seas'. It is the overarching framework for preparing marine plans across the UK. These will be used for decisions affecting the marine environment."</p>
Section 2.4: Considering benefits and adverse effects in marine planning	
<p>Consider benefits and adverse effects of plan policies</p>	<p>The <i>Sustainability Appraisal</i> has considered the benefits and adverse effects of policy on the marine area as follows:</p> <ul style="list-style-type: none"> • The Character Area policies generally present an opportunity to increase biodiversity, through requirements relating to green infrastructure. • Regarding Policy CA4 - Portslade & Southwick Beaches, The beach areas and adjacent public spaces will be safeguarded for the protection of coastal processes, marine habitats and the enjoyment of local communities and visitors. • Policy CA6 - Harbour Mouth – includes the requirement to protect the Shoreham Beach Local Nature Reserve and promotes opportunities to interpret the marine environment. • Policy SH9 - Place making and design quality - supports the development of high quality places that are sensitive to their surroundings, the character of the marine environment, historic features, and to strategic views of the waterfront and surrounding landscape. • Policy CA5 Fishersgate & Southwick supports the delivery of approximately 4,000m² employment floorspace, small business units suitable for marine-related industries, and a

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Policy Expectations	Evidence Provided
	possible location for the Sea Cadets and Nautical Training Corps. All of these development measures support the provision of new jobs in the area.
<p>Section 2.5: Economic, social and environmental considerations</p>	
<p>Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)</p>	<p>The Water Framework Directive is specifically referenced in the following policy:</p> <ul style="list-style-type: none"> • Policy SH7: Natural environment, biodiversity and green infrastructure: Clause 9 states that all development must comply with the Water Framework Directive. Development must protect surface and groundwater quality. Only clean surface water should be discharged into the River Adur, the Canal and groundwater. Pollution control measures will be required to deal with surface water run-off where this is discharging straight into the River Adur or the Canal, especially where waterside vehicular access is promoted. <p>This policy accords with the following Local Plan policies:</p> <ul style="list-style-type: none"> • <i>Adur local Plan 2017</i>: Policy 35: Water Quality and Protection • <i>Brighton & Hove City Plan Part One (2016)</i>: CP8 Sustainable Buildings
<p>3.1 Marine Protected Areas</p>	
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<p>The <i>Shoreham Harbour Ecology and Green Infrastructure Study (2015)</i> makes a number of proposals to enhance the green infrastructure and biodiversity of the harbour and surrounding areas. These include:</p> <ul style="list-style-type: none"> • Portslade and Southwick Beaches green corridor. The <i>Shoreham Harbour Vegetated Shingle Assessment</i> identified significant potential for coastal vegetated shingle habitat creation along these beaches. Habitat creation could be delivered as part of improvements to coastal defences and through the delivery of the England Coast Path and improved cycle route along the

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Policy Expectations	Evidence Provided
	<p>beaches.</p> <ul style="list-style-type: none"> Linear intertidal habitat creation. The study identifies opportunities to deliver habitats as part of new flood defences along the waterfront. This includes timber baulking and ‘vertical beaches’ attached to sheet piling. <p>Marine conservation and biodiversity impacts are further considered in the following policies:</p> <ul style="list-style-type: none"> Policy SH7 Natural environment, biodiversity and green infrastructure: Vegetation must be salt tolerant and suitable for a coastal environment, and , development will be required to incorporate ecological enhancements to the marine/estuarine/ riverine environment in order to promote biodiversity. Policy CA6: Harbour mouth: The partnership will work with the community and stakeholders to improve Kingston Beach, including promoting opportunities for interpretation of marine environment and biodiversity.
3.4 Ports and shipping	
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<p>The issues of navigation and shipping are considered in Objective 2. Shoreham Port. This section of the Joint Area Action Plan states that Shoreham Port Authority is responsible for the management of navigational safety within harbour limits, and has permitted development rights for certain types of development within the harbour</p> <p>This is further reflected in the following policy modification:</p> <ul style="list-style-type: none"> Proposed clause 3. of Policy CA7: Western Harbour Arm: Proposals for sites WH1 and WH2 will be required to demonstrate that potential implications for the safety of navigation have

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Policy Expectations	Evidence Provided
	<p>been addressed in agreement with statutory bodies, including Shoreham Port Authority.</p> <p>Shoreham port policy and masterplan, minerals and employment topic paper</p> <p>Shoreham Port Authority (SPA) is a consultee. In addition, the SPA is a partner in the Shoreham Harbour Regeneration partnership and progressing the Shoreham Harbour Joint Area Action Plan.</p>
3.8 Fisheries	
<p>Consider potential economic, social and environmental impacts of other developments on fishing activity</p>	<p>The Joint Area Action Plan will manage the sustainable development of marine industries such as shipping, marine aggregates, fishing and windfarms, as well as the conservation and protection of marine habitats and species. Some of the beaches, such as Southwick Beach, Shoreham Beach and, to a lesser extent, Kingston Beach are well used for traditional seaside activities (walking, swimming, sunbathing and fishing).</p>
3.9 Aquaculture	
<p>Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries</p>	<p>N/a</p>
3.10 Surface water management and waste water treatment and disposal	
<p>Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment</p>	<p>Waste water infrastructure is considered in the following policies:</p> <ul style="list-style-type: none"> • Policy CA1: South Quayside: South Quayside is safeguarded for future commercial port activity and for the relocation of existing port operators from elsewhere in the harbour. With the exception of the existing power stations, and waste water treatment plant, non-port operations are not permitted in this area.

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Policy Expectations	Evidence Provided
	<p>The Joint Area Action Plan is consistent with the following Local Plan Policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 35: Pollution and Contamination; Policy 36: Water Quality and Protection, and Policy 37: Flood Risk and Sustainable Drainage of the Submission Adur Local Plan. <p><i>Brighton & Hove City Plan Part One (2016)</i>: Policy DA8 – Shoreham Harbour, Policy SA1 - The Seafront, CP8 Sustainable Buildings.</p>
3.11 Tourism and recreation	
<p>Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and local communities</p>	<p>The following policies of the Joint Area Action Plan reflect marine tourism and recreation.</p> <ul style="list-style-type: none"> • Policy SH8 Recreation and leisure – Clause 6: Major waterfront development schemes, are expected to incorporate features that improve open access to the waterfront. These may include facilities for boat users, additional moorings, floating pontoons/docks, slipways and inlets. Early consultation with Shoreham Port Authority and statutory bodies such as the Environment Agency and Marine Management Organisation is advised. • Policy SH9: Place making and design quality: This policy requires schemes to reflect the character of the marine environment and should be sensitive to views of the waterfront, and Waterfront development schemes are encouraged to incorporate features that improve public access, views and experience of the marine environment. • Policy CA4 Portslade & Southwick Beaches: The beach areas and adjacent public spaces will be safeguarded for the protection of coastal processes, marine habitats and the enjoyment of local communities and visitors. • Policy CA5: Fishersgate and Southwick: Lady Bee Marina will be reconfigured. This will Improve

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Policy Expectations	Evidence Provided
	<p>marina facilities, expand berthing capacity and waterside leisure provision, including a new slipway.</p> <ul style="list-style-type: none"> • Policy CA6: Harbour Mouth: Promote opportunities for interpretation of marine environment and biodiversity. The partnership will work with the community and stakeholders to improve Kingston Beach including: • Policy CA7: Western Harbour Arm: The partnership will work with developers and stakeholders to secure a comprehensive redevelopment of the Western Harbour Arm Waterfront. Marine-related leisure facilities are also encouraged. Major development must incorporate features that improve open access to the waterfront and facilities for boat users such as additional moorings, floating pontoons/docks and slipways. <p>Objective 8: Recreation and leisure of the Joint Area Action Plan specifically references marine tourism, and recreation in the following ways:</p> <ul style="list-style-type: none"> • To enhance and activate the harbour for leisure, recreation and tourism and encourage active, healthy lifestyles. • To improve connections to and use of the waterfront, coast and beaches as attractive destinations for both locals and visitors. <p>The Area priorities for Character Area 1: South Quayside also reference marine tourism:</p> <ul style="list-style-type: none"> • To improve Basin Road South as a popular recreational route for walking and cycling, providing access to the beaches.

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Policy Expectations	Evidence Provided
	<p>The Joint Area Action Plan is consistent with the following Local Plan Policies:</p> <ul style="list-style-type: none"> • <i>Adur Local Plan 2017</i>: Policy 31: Biodiversity • <i>Brighton & Hove City Plan Part One (2016)</i>: Policy SA1 - The Seafront

Appendix One

This is an alphabetical list of all local planning authorities in England whose area overlaps with the UK marine area.

Adur	Carlisle	City of Westminster	Exmoor National Park
Allerdale	Castle Point	Colchester	Fareham
Arun	Chelmsford	Copeland	Fenland
Babergh	Cheshire West and Chester	Cornwall	Fylde
Barking and Dagenham	Chichester	County Durham	Gateshead
Barrow-in-Furness	Chorley	Dartford	Gloucester
Basildon	Christchurch	Doncaster	Gosport
Bassetlaw	City of London	Dover	Gravesham
Bexley	City of Brighton and Hove	East Cambridgeshire	Great Yarmouth
Blackpool	City of Bristol	East Devon	Greenwich
Boston	City of Kingston upon Hull	East Lindsey	Halton
Bournemouth	City of Peterborough	East Riding of Yorkshire	Hambleton
Broadland	City of Plymouth	Eastbourne	Hammersmith and Fulham
Broads Authority	City of Portsmouth	Eastleigh	Hartlepool
Canterbury	City of Southampton	Exeter	Hastings

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Havant
Havering
Horsham
Hounslow
Huntingdonshire
Ipswich
Isle of Wight
Isles of Scilly
Kensington and Chelsea
King's Lynn and West Norfolk
Lake District National Park
Lambeth
Lancaster
Lewes
Lewisham
Liverpool
Maidstone
Maldon
Medway
Middlesbrough
New Forest
New Forest National Park
Newark and Sherwood
Newcastle upon Tyne
Newham
North Devon
North East Lincolnshire
North Lincolnshire
North Norfolk
North Somerset
North Tyneside
North York Moors National
Park
Northumberland
Norwich

Poole
Preston
Purbeck
Redcar and Cleveland
Richmond upon Thames
Rochford
Rother
Scarborough
Sedgemoor
Sefton
Selby
Shepway
South Cambridgeshire
South Downs National Park
South Gloucestershire
South Hams
South Holland
South Lakeland
South Norfolk
South Ribble
South Somerset
South Tyneside
Southend-on-Sea
Southwark
Stockton-on-Tees
Stroud
Suffolk Coastal
Sunderland
Swale
Taunton Deane
Teignbridge
Tendring
Test Valley
Thanet
Thurrock

Tonbridge and Malling
Torbay
Torrige
Tower Hamlets
Wandsworth
Warrington
Waveney
Wealden
West Devon
West Dorset
West Lancashire
West Lindsey
West Somerset
Weymouth and Portland
Winchester
Wirral
Worthing
Wyre
York