

Review of Additional Modifications

Please could the Councils review the following Additional Modifications. It would be helpful if a brief explanation could be provided of why it is considered that these proposed changes, either alone or in combination with others, would not materially alter the Plan or its policies:

- MIN30 – reference to needs of existing communities
- MIN61 – reference to ecological information in Policy SH7(4)
- MIN68 – reference to delivering enhancements in Policy CA4(2)
- MIN71 – inclusion of omitted text at paragraphs 4.6.1-4.6.4
- MIN78 – clarification that provisions would apply to all residents
- MIN81 – inclusion of omitted text to SH10(3)

LPA response:

- **MIN30:** Paragraph 2.2.19 relates to national policy requirements as set out in Section 8 of the National Planning Policy Framework. Paragraph 73 of the NPPF states that: *“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.”* Proposed modification MIN30 adds reference to the recreation and leisure needs of existing communities. The LPAs do not consider this to be a material change to the plan as it is restating a national policy requirement. The LPAs are content that the plan is sound without the modification. However the modification has been proposed for consideration in order to address the concerns raised by Shoreham Rowing Club.
- **MIN61:** Policy SH7 (4) requires development to ensure no net loss and to seek to provide a net gain to biodiversity. This accords with paragraphs 9 and 109 of the NPPF. In order for the LPAs to assess whether a development application complies with this policy, up-to-date ecological information will be required. Sussex Wildlife Trust proposed an amendment to this policy to clarify the requirement for up-to-date ecological information, which the LPAs have accepted as proposed modification MIN61. This adds clarity to the policy rather than an additional requirement. Therefore, the LPAs do not consider this to be a material change to the plan.
- **MIN68:** Policy CA4 (2) relates to the promotion of enhancements to vegetated shingle and further habitat creation at Portslade and Southwick beaches. The regeneration partnership will explore opportunities for the creation of habitat creation through the forthcoming Green Infrastructure Strategy. The beaches are owned by members of the regeneration partnership. Therefore the responsibility for delivering this will be the responsibility of the project partners. Proposed modification MIN68 clarifies this. The LPAs do not consider that this is a material change to the policy.
- **MIN71:** Paragraphs 4.6.1 to 4.6.4 are a factual description of the Harbour Mouth character area. They describe the geographical location of the character area, and provide information about Shoreham Fort. An error in converting the documents for printing resulted in these paragraphs being obscured by the Map 11, which shows the proposals. The paragraphs were not omitted from the electronic version of the plan. The text of these paragraphs was included in previous versions of the plan. It was unchanged at publication stage, although the LPAs are proposing a minor modification to improve the sentence syntax. The text is

purely background factual information. Therefore the LPAs do not consider this to be a material change.

- **MIN78:** This relates to the provision of additional berths for boat users. Paragraph 4.7.55 suggests that these will be for visitors and *new* residents. The proposed modification removes the word *new*. Where berths are provided, these will not be owned or operated by the local authorities. There was no intention to restrict the use of these berths to new residents only. Therefore the modification clarifies this. The LPAs do not consider that this is a material change as it is not part of the policy. The amendment makes the text more consistent with the previous sentence which refers to waterfront facilities for “local residents”.
- **MIN81: The LPAs would like to draw the Inspectors attention to an error in numbering the modifications. It is suggested that this now be referred to as MIN82.** A formatting error during the preparation of the publication plan meant that part of the text to Policy SH10(3). This text had been added to an earlier version of the plan at the request of Southern Water. There was no intention to remove this wording. Southern Water brought this omission to the attention of the authorities in its representation on the plan. The policy describes developers reaching agreement with utility providers over infrastructure requirement. Without the missing text, it is an incomplete sentence and does not make sense. However, the LPAs do not consider this a material change, as such agreement would still be necessary.