



# SHOREHAM HARBOUR REGENERATION

## CONSOLIDATED PROPOSED MODIFICATIONS TO THE SHOREHAM HARBOUR JOINT AREA ACTION PLAN

EXAMINATION - SEPTEMBER 2018





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

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

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

Main Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are shown in purple text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the <i>Proposed Submission Shoreham Harbour Joint Area Action Plan (2017)</i> unless otherwise stated).	Sustainability appraisal finding (please note that modifications proposed after Submission have not yet been appraised)
PH/MM1	1.1.3	Pre-Hearing	The plan builds on and complements the Adur Local Plan (2017) and the Brighton & Hove City Plan Part One (2016). Planning applications within the regeneration area must comply with the strategy and policies in the JAAP, as well as the relevant local plans, <u>unless material considerations indicate otherwise.</u>	To address compliance with section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. Suggested in response to Inspector's question 6.	Not yet appraised
Sub/MM1	2.1 Vision – 2 <sup>nd</sup> paragraph	Submission	The redevelopment of key areas of the harbour will provide benefits for the local community, <u>natural environment</u> and economy through increased investment, improved leisure opportunities, enhanced public realm and the delivery of critical infrastructure that will help respond positively to climate change.	To address an issue raised by Sussex Wildlife Trust (Representation: 2017-1002) and to reflect in the vision the approach to natural capital taken in the JAAP.	The vision itself has not undergone SA assessment, as the aims of the vision are further addressed through policies. The inclusion of text relating to the natural environment is addressed in particular through policies SH6 Flood risk and sustainable drainage, and SH7 Natural environment, biodiversity and green infrastructure.  <b>This amendment has no implications on the SA assessment. No change to any previous SA assessments.</b>
PH/MM2	2.2.19	Submission/ Pre-Hearing	Local planning authorities should plan for recreational and leisure facilities and services to meet the needs of <u>existing communities and</u> new development. Planning plays an important role in promoting healthy and active lifestyles. This includes the provision of open space, sports and recreation facilities.	The Councils proposed this as a minor modification (MIN30). However it is included as a main modification in response to the Inspector's Guidance Notes. Representation JAAP2017-1510b (Shoreham Rowing Club) stated that the JAAP is unsound and proposed the following modification: Local planning authorities should plan for recreational and leisure facilities and services to meet the needs of new development <u>and those of the existing community by further enhancing existing leisure facilities and services.</u> The Councils do not accept that the plan is unsound. However, the proposed amendment makes clear that the needs of existing communities should also be considered.	Not within policy. No SA implications.
PH/MM3	2.2 Objective 4: Housing and community	Pre-Hearing	To <u>contribute to meeting the housing needs of Adur and Brighton &amp; Hove</u> <del>address shortfalls in local housing provision</del> through delivering new homes of a range of sizes, tenures and types, including affordable and family homes as well as associated supporting community infrastructure.	To clarify that the JAAP makes a contribution to meeting housing needs rather than addressing shortfalls in housing provision. Suggested in response to Inspector's question 31.	Not yet appraised
Sub/MM2	3.1.16 – 3.1.18	Submission	<del>3.1.16 – As part of the South Quayside Character Area proposals (within Section 4 of this document), there is potential to work with the existing Shoreham Power Station to deliver a district heating network to provide waste heat to local consumers.</del>	To address the findings of the <i>Shoreham Harbour Heat Network Study (2016)</i> and the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> ; and to reflect the current status of the Shoreham Heat Network project. The <i>Shoreham Harbour Heat Network Study (2016)</i> found that the low utilisation and the scheduled	These amendments are within the supporting text and provide background information largely in relation to the updated Shoreham Harbour District Energy Feasibility Study (2018). The supporting text relating to opportunities within South Quayside Character Area has been removed, as the 2016 Study found this not to be feasible. This deletion now better reflects

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			<p><u>3.1.16</u> 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. Heating and hot water for buildings account for 40% of UK energy use and 20% of greenhouse gas emissions. The Climate Change Committee estimates that district heating can meet 20% of domestic heating and hot water needs by 2030. The Climate Change Act 2008 obliges the UK to cut 80% emissions by 2050. The Clean Growth Strategy (2017) includes policies to roll out low carbon heating, and phase out the installation of high carbon fossil fuel heating.</p> <p>3.1.17 <u>Shoreham Harbour Regeneration Partnership, Adur District Council, West Sussex County Council and Shoreham Port Authority have formed the Shoreham Heat Network Partnership.</u> The Heat Network Delivery Unit (HNDU)<sup>30</sup> has provided part funding to explore the potential for heat networks in and around Shoreham Harbour. The <i>Shoreham Harbour Heat Network Study (2016)</i> mapped heat demands and identified potentially viable scenarios for network development. <u>The <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> proposes a 2km network serving the allocated sites at the Western Harbour Arm, the site of the former Adur Civic Centre and a number of existing buildings in Shoreham-by-Sea town centre.</u></p> <p><u>3.1.18</u> The study finds that a network served by marine source heat pumps and gas CHP technologies would provide affordable, low carbon heat and the combination of technologies provides a more robust, lower risk solution than a single heat source. Engagement with Shoreham Port Authority has identified the potential for abstraction and discharge points in the mouth of the River Adur, subject to appropriate environmental permits.</p> <p><del>3.1.18</del> <u>3.1.19</u> The heat network partnership is carrying out a detailed feasibility study and preparing the business case for detailed project development of the Shoreham Heat Network. All new development in and around the Western Harbour Arm development is required to connect to the proposed network once complete. Development coming forward before the heat network is delivered is required to be connection ready, and to connect once the network is in place. The council will secure the connection of the approved schemes through planning conditions and/or Section 106 agreements.</p>	<p>decommissioning date of the plant means that, unless there are significant changes in operation, Shoreham Power Station cannot be considered as a reliable potential heat source.</p> <p>The <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> has updated the findings of the earlier study and carried out feasibility assessment of the identified network. The heat network project partners are now progressing to detailed project development.</p>	<p>the supporting text of CA1.</p> <p>The supporting text now has more information in relation to NPPF requirements and has various statistics and targets relating to energy use.</p> <p>The supporting text now clarifies that it is proposed that the heat network should serve the allocated sites in the Western Harbour Arm as well as some other buildings and sites within the Shoreham town centre area, based on the findings of the updated 2018 study. The supporting text clarifies that all development within this area will be required to connect once complete, or enable future connection to take place.</p> <p>The supporting text now also clarifies that the a heat network sourced by a combination of technologies, rather than one source, would provide a lower risk, more robust solution, and refers to marine source heat pumps, subject to environmental permits.</p> <p><b>All amendments within supporting text only and are reflected in changes to policy text, as outlined under MM5 below. See MM5.</b></p>

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			<p><del>The partnership has commissioned a further study to carry out detailed feasibility and business model options appraisals of the potential network. This study will be complete in early 2018. If feasible and deliverable, the network may be run by the local authorities or be an independent delivery body or Energy Service Company (ESCO).</del></p> <p><sup>30</sup> 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.</p> <p>Subsequent paragraphs in Section 3.1 renumbered to reflect additional paragraph</p>		
Sub/MM3	Policy SH1 (4)	Submission	Developers should demonstrate how they can contribute towards <u>the regeneration partnership's Shoreham Port Authority's</u> objective of becoming a hub for renewable energy generation.	To reflect that this is a shared objective of all regeneration partners.	This modification will not change how policy is implemented or what is delivered.  <b>This amendment has no implications on the SA assessment. No change to SA assessment for SH1 from this amendment.</b>
Sub/MM4	Policy SH1 (5)	Submission	<u>The partnership will support proposals for renewable and low carbon energy generation, including solar photovoltaics.</u> All new development will be expected to incorporate low and zero carbon, decentralised energy opportunities.	To address an issue raised by Sussex Wildlife Trust (Representation: 2017-1005). Although the representor considers the plan sound, the proposed modification better reflects the references to renewable and low carbon energy generation in the background text, as well as the approach to renewable and low carbon energy generation in Policy 19: Decentralised energy, Stand-alone Energy Schemes and Renewable Energy of the <i>Adur Local Plan 2017</i> .	The newly added first sentence is a strong indication that low and zero carbon proposals will be supported. This amendment strengthens the policy and has positive impacts for the SA Objective 1: "Increase energy efficiency..." The score for this objective is already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score.  <b>No change to SA score for SH1 in relation to this modification.</b>
Sub/MM5	Policy SH1 (6)	Submission	<u>The councils will support the development of district heat networks and associated infrastructure.</u> Development in areas identified in the <u><i>Shoreham Harbour District Energy Feasibility Study (2018)</i></u> <del><i>Shoreham Harbour Heat Network Study (2016)</i></del> , or subsequent update, will be <u>required</u> <del>expected</del> to connect to district heating networks where they exist, or incorporate the necessary infrastructure for connection to future networks.	To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> ; and the current status of the Shoreham Heat Network project.	The newly added first sentence is a strong indication that heat networks and associated infrastructure will be supported. The amendment from "expected" to "required" is a stronger policy position. The policy refers to the updated Study, and that development within certain areas identified within the study will be required to connect to networks or provide for future for future connection. The area within which development is now required to connect, or provide for future connection is the Western Harbour Arm area, as described within the supporting text. This provides a clearer policy position than the previous version, as it was not clear from the 2016 study which areas were identified. It is noted that the Western Harbour Arm area should provide the majority of the residential development from within the JAAP area and approximately half the employment floorspace, therefore delivery of district heating within this area would have greater positive outcomes in relation to protecting against future fuel poverty of residents in particular. In addition, the study indicates connection to some existing residential development, therefore potentially reducing any fuel poverty associated with these existing buildings. The amendment also refers to associated infrastructure and from the supporting text,

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					<p>it is proposed that marine source heat pumps would provide this heat source. This infrastructure would involve pipes within the water (in the Harbour mouth area) and can result in a temperature change to the water. This could have impacts on marine ecology.</p> <p>The amendments strengthen the policy in relation to SA Objectives 1: “Increase energy efficiency...”; and objective 11: “Improve health and well-being...”. However, there is potential for adverse impact on ecology resulting from the infrastructure, resulting in an adverse uncertain impact for SA objective 4: “conserve, protect and enhance biodiversity and habitats”.</p> <p><b>The scores for objectives 1 and 11 are already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score for these objectives. However, the score has been changed for objective 4, and therefore the policy requires re-assessment in relation to this modification.</b></p>
PH/MM4	3.4 Objective 4: Housing and community	Pre-Hearing	To <u>contribute to meeting the housing needs of Adur and Brighton &amp; Hove address shortfalls in local housing provision</u> through delivering new homes of a range of sizes, tenures and types, including affordable and family homes as well as associated supporting community infrastructure.	To clarify that the JAAP makes a contribution to meeting housing needs rather than addressing shortfalls in housing provision. Suggested in response to Inspector’s question 31.	Not yet appraised
Sub/MM6	Policy SH6 (1)	Submission	<u>The partnership will support the delivery of measures to mitigate flood risk and coastal erosion in the regeneration area.</u> Development proposals in the regeneration area must comply with the principles and approach to flood risk management set out in the <i>Shoreham Harbour Flood Risk Management Guide (2015)</i> , or subsequent <del>updated</del> <u>guidance and must take account of the most up to date flood risk management evidence and policy in consultation with the relevant authorities, including the Environment Agency. Where development creates new or alters flood flow routes, the site specific Flood Risk Assessment must assess the potential flood hazard posed by them to ensure that flood risk is not increased elsewhere.</u>	To address issues raised by Hopegar Properties Ltd (Representation JAAP2017-1204) and the Environment Agency (Late Representation: JAAP 2017-2001). Hopegar Properties Ltd suggest that the plan is unsound as it does not include sufficient details of the required flood defence measures proposed in The Shoreham Harbour Flood Risk Management Guide. The representation suggests that the policy should include specific reference to improving the lock gates at Southwick, and a commitment to specific flood defence measures. The councils do not consider this appropriate. The Shoreham Harbour Flood Risk Management Guide in a Supplementary Planning Document in its own right. The JAAP requires proposals to comply with the principles and approach it contains. The background text refers to wider strategies on flood risk and coastal erosion management. The councils do not accept that the plan is unsound. However, the proposed amendment makes reference to supporting mitigation measures. The Environment Agency suggest that the plan is unsound as it does not make reference to the climate change allowances, and because parts of the Shoreham Harbour Flood Risk Management Guide are out of date. The councils do not accept that the plan is unsound. However, the proposed amendment removes the date, allowing for an update to the Flood Risk Management Guide, and	The newly added first sentence is a strong indication that flood risk and coastal erosion mitigation measures will be supported and provide further support to implementation of other policy requirements within SH6. The amended text regarding the consideration of guidance and evidence helps to future proof the policy. The amendments strengthen the policy and have positive impacts for the SA objectives 10: “Ensure all developments have taken into account the changing climate and are adaptable to extreme weather events” and objective 18: “ Avoid, reduce and manage the risk from all sources of flooding to and from development and minimise coastal erosion where possible”. <b>Both scores for these objectives are already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score for these relevant objectives for this policy. No change to SA assessment for SH6 in relation to this modification.</b>

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				makes clear that any subsequent evidence and policy will be taken into account. The amendment also corrects a drafting error whereby clause 3 of Policy SH6 was replicated at the end of clause 1.	
PH/MM5	Policy SH6 (6)	Pre-Hearing	Where undefended land levels are below the 1 in 200 year tidal flood event for 2115, <del>land-raising</del> <u>of occupied storeys of buildings</u> and/or flood defences should be provided to 5.4m AOD. For sites where existing defences / land levels do not meet the heights outlined above, developers will be required to deliver flood defences or <del>land-raising</del> <u>of occupied storeys of buildings</u> to this height to meet the required standard of protection.	Modification proposed by LPAs in Matters Statement 5 to ensure policy is effective and consistent with national policy.	Not yet appraised
PH/MM6	Policy SH6 (15) (12)	Pre-Hearing	Proposals which seek to provide basement parking in tidal/fluvial flood zones will only be acceptable where adequate mitigation and emergency planning are included as part of the planning application. <u>Developers will be required to demonstrate that drainage and separators will not release potential contaminants to the environment.</u>	Modification proposed by LPAs in Matters Statement 5 to ensure policy is effective and consistent with national policy. The numbering of this clause is amended by proposed minor modification MIN54.	Not yet appraised
PH/MM7	Policy SH7 (4)	Submission/ Pre-Hearing	All development <u>applications</u> must <u>be accompanied up to date ecological information to</u> ensure no net loss and seek to provide a net gain to biodiversity, in particular to Habitats of Principal Importance (formerly known as BAP habitats). The indirect impacts of development, such as recreational disturbance, on designated nature conservation sites and other significant habitats must be considered. Appropriate mitigation must be identified, along with the means for its delivery and maintenance.	The Councils proposed this as a minor modification (MIN61). However it is included as a main modification in response to the Inspector's Guidance Notes. To address an issue raised by Sussex Wildlife Trust (Representation: JAAP2017-1007). The consultee does not suggest that the plan is unsound. However, the proposed amendment clarifies the requirement for ecological information.	Further strengthens the SA assessment against SA objective 4: "Conserve, protect and enhance biodiversity (flora and fauna) and habitats". However does not change the SA score which is already positive.
Sub/MM7	Policy SH7 (7)	Submission	Where impacts on biodiversity cannot be avoided or mitigated, compensatory <del>actions measures</del> will be required, taking account of an up-to-date ecological survey. <u>Like-for-like compensatory habitat should be provided at or close to the site, subject to agreement with the relevant authorities, including Natural England and the Environment Agency.</u>	To respond to an issue raised by the Environment Agency (Late Representation 2017-2003).	This amendment provides further details on how /where compensatory habitat should be provided.  The amendment strengthen the policy and has positive impacts for the SA objective 4: "Conserve, protect and enhance biodiversity and habitats".  <b>The score for this objective is already positive, and although the policy is considered to strengthen the positive impact, it does not change the previous SA score for this relevant objectives. No change to SA assessment for SH7 in relation to this modification.</b>
PH/MM8	Policy SH7 (13)	Pre - Hearing	Air quality impacts should be considered at an early stage in the design process to ensure that creating new exposure to poor air quality is avoided. <u>Development proposals must be accompanied by an assessment of the air quality impacts for existing and future occupants. This assessment must have regard to the cumulative impacts of committed and planned development on air quality.</u>	To ensure that the plan is effective in addressing air quality impacts, including cumulative impacts, of new development. Suggested in response to Inspector's question 22.	Not yet appraised
PH/MM9	Policy SH8 (1)	Pre-Hearing	New development will be required to <u>contribute to the provision of</u> provide high quality, multifunctional public open space / green infrastructure <u>to meet the needs it generates</u> onsite. The type and quantity of open space will be determined by the scale and type of development, <u>having regard to</u> the identified needs local standards and the <i>Shoreham Harbour Green Infrastructure Strategy</i> . <u>Development will be expected to optimise the amount of onsite provision. Where it is not possible to meet all or part of the open space requirements on site, subject to agreement of the council(s), an</u>	To ensure that the policy is effective and remove potential conflict with CA2(10), CA3(12) and CA7(15). Suggested in response to Inspector's question 45.	Not yet appraised

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			<u>appropriate alternative provision, such as enhanced public realm, and/or contribution towards off site provision will be required.</u>		
PH/MM10	3.9.4	Pre-Hearing	New paragraph: <u>Public art can play an important role in creating and enhancing local distinctiveness. It provides an opportunity to involve local communities in place making, and to offer work opportunities to artists, including from the local area. Where appropriate, the partnership and councils will expect to be involved in the selection process. Public art can include architectural details, public realm elements, landscaping schemes, sculpture, water features, street furniture and lighting effects. It should be directly related to its setting, and therefore be an integral element of a proposal.</u> [subsequent paragraphs renumbered]	To ensure the policy is effective and consistent with ALP, B&HCP(1) and CIL Regulations. Modification proposed in response to Inspector's question 52.	Not yet appraised
PH/MM11	Policy SH9 (4)	Pre-Hearing	Where appropriate, <u>major development will be expected to incorporate an integral public art element</u> contribution will be sought for the provision of public art, in accordance with the scale of development proposed <u>and in agreement with the council.</u>	To ensure the policy is effective and consistent with ALP, B&HCP(1) and CIL Regulations. Modification proposed in response to Inspector's question 52.	Not yet appraised
PH/MM12	Policy CA3 (4)(f)	Pre-Hearing	SP6 – Church Road/Wellington Road/ St Peter's Road: The southern portion of the site is allocated for new employment development (use classes B1, B2 and B83). Employment uses must be compatible with adjacent residential development. As part of a comprehensive redevelopment, residential development is acceptable on the northern portion of the site, fronting onto St Peter's Road.	To correct a typographic error	Not yet appraised
PH/MM13	Policy CA4 (2)	Submission/ Pre-Hearing	<ul style="list-style-type: none"> <li>The partnership will promote <u>and deliver</u> the enhancement and creation of vegetated shingle habitats to create a continuous corridor along the beaches. Compensatory habitat creation and safeguarding will be required for any loss or disturbance to existing habitats.</li> </ul>	The Councils proposed this as a minor modification (MIN68). However it is included as a main modification in response to the Inspector's Guidance Notes. To address an issue raised by Sussex Wildlife Trust (Representation: JAAP2017-1011). The consultee does not suggest the plan is unsound. However, the proposed amendment clarifies the partnership's commitment to delivering enhancements to coastal vegetated shingle habitats.	Further strengthens the SA assessment against SA objective 4: "Conserve, protect and enhance biodiversity (flora and fauna) and habitats". However does not change the SA score.
Sub/MM8	CA6 Area priorities	Pre-Submission	<ul style="list-style-type: none"> <li>To support the conservation of Shoreham Fort.</li> <li>To enhance connections between Shoreham town centre, Shoreham Beach and Shoreham Fort through environmental and landscaping improvements.</li> <li>To support the redevelopment of Shoreham Rowing Club and enhance the public realm environment of Kingston Beach.</li> <li>To explore options for the future use of the Albion Street lorry park.</li> <li>To support Adur Homes in exploring options for redevelopment of housing sites.</li> <li><u>To support the delivery of the Shoreham Heat Network</u></li> </ul>	Due to a printing error, the area priorities were not included in printed versions of the Proposed Submission plan. The five priorities were unchanged from the 2016 consultation. The priorities are reflected in the policies, so this does not affect the intent of the plan. No representations were received regarding this omission. A sixth priority is added to reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> ; and the current status of the Shoreham Heat Network project.	The area priorities were within the version of the JAAP that was considered by the SA.  The additional priority relating to delivery of the Shoreham Heat Network is addressed within the policy itself. See MM10.
PH/MM14	4.6.1 – 4.6.4	Pre-Submission	<p>4.6.1 CA6 – Harbour Mouth is split across either side of the River Adur at the mouth of the river. This is the entrance to the harbour. The southern section is also within the area covered by the emerging Shoreham Beach Neighbourhood Plan.</p> <p>4.6.2 <del>On Shoreham Beach is the</del> <u>The</u> remains of Shoreham Fort, a Scheduled Monument, <u>are on Shoreham Beach</u>. The fort was completed in 1857 and is one of the celebrated south coastal defences built under the Victorian Prime Minister Lord Palmerston.</p>	The Councils proposed this as a minor modification (MIN71). However it is included as a main modification in response to the Inspector's Guidance Notes. Due to a printing error, these paragraphs were not included in printed versions of the proposed submission plan. The missing text was unchanged from the 2016 consultation. No representations were received regarding this omission. Paragraph 4.6.2 has been reworded to	Typographical correction/re-wording. No SA implications.

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			<p>It is of national historical importance and was a vital part of the south coast defence system.</p> <p>4.6.3 A local charity, the Friends of Shoreham Fort supported by Shoreham Port Authority, have taken responsibility for conserving the fort. This area is a popular destination for walkers. It is well used by anglers and home to the National Coastwatch Institute look-out tower.</p> <p>4.6.4 In recent years there have been various plans for the fort including local interest for incorporating an educational facility and improving the public toilet block.</p>	improve sentence syntax.	
Sub/MM9	4.6.16 – new paragraph	Submission	<u>The Shoreham Heat Network Partnership is progressing the delivery of a district heating network. The Shoreham Harbour District Energy Feasibility Study (2018) proposes a network served by marine source heat pumps and gas CHP. The study identifies the Middle Pier at the mouth of the harbour as a potential abstraction point for marine source heat pumps, and a discharge point to the west of the lifeboat station.</u>	To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> ; and the current status of the Shoreham Heat Network project.	This new paragraph is within the supporting text and provides background information relating to the type and location of energy infrastructure relating to the provision of a heat network. This paragraph confirms that marine source heat pumps are proposed, and identifies the harbour mouth area as a location for the abstraction points and discharge points. <b>This is considered further under MM10.</b>
Sub/MM10	CA6 (9) – new clause	Submission	<u>The council will support the development of infrastructure to deliver the Shoreham Heat Network.</u>	To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> ; and the current status of the Shoreham Heat Network project.	As described under MM9, the updated Study proposed that marine source heat pumps could provide the energy source for the future heat network and that the pumps and pipework would be located within the harbour mouth area. This new clause reflects the need to provide this infrastructure in this location and provides a strong signal that development of infrastructure will be supported within this area. Provision of a heat network will have positive implications for SA objective 1: “Increase energy efficiency...” and SA objective 11: “Improve health and wellbeing...”. This is a change from the previous SA assessment, whereby the policy was found to have no impact on objective 1. In addition, marine source heat pump infrastructure will comprise pipework within the water, can result in a change in temperature and can have impacts on the ecosystem, potentially having adverse impacts on SA objective 4: “conserve, protect and enhance biodiversity and habitats”. This is also a change from the previous SA. <b>This modification has potential to change the previous SA assessment for some of the SA objectives and requires a re-assessment of the policy.</b>
Sub/MM11	CA7 Area priorities		• <u>To support the delivery of the Shoreham Heat Network</u>	Added priority to reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> ; and the current status of the Shoreham Heat Network project.	The additional priority relating to delivery of the Shoreham Heat Network is addressed within the policy itself. <b>See MM12.</b>
PH/MM15	4.7.18	Pre-Hearing	Comprehensive <del>land-raising of occupied storeys of buildings</del> and/or flood defence provision will be essential to protect existing and future residents and businesses as well as the A259. This approach, which focuses on flood defence provision from the Adur Ferry Bridge to Kingston Beach, will ensure the complete closure of the flood cell and continuation of the line of new defences currently being provided via the Shoreham Adur Tidal Walls Scheme - an Environment Agency funded flood defence scheme which ends at the Adur Ferry Bridge.	Modification proposed by LPAs in Matters Statement 5 to ensure policy is effective and consistent with national policy.	Not yet appraised
Sub/MM12	4.7.74 –	Submission	<u>Shoreham Heat Network</u>	To reflect the findings of the <i>Shoreham Harbour District</i>	These new paragraphs are within the supporting text and

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	4.7.76 new paragraphs		<p><u>4.7.74 The Western Harbour Arm allocation is identified in the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i> for the planned Shoreham Heat Network. This aims to provide low carbon, affordable warmth to residents and businesses. The district heating project is being developed by the Shoreham Heat Network Partnership, comprised of Shoreham Harbour Regeneration, Adur District Council, West Sussex County Council and Shoreham Port Authority.</u></p> <p><u>4.7.75 New development in and around the Western Harbour Arm development will be required to connect to the proposed network once complete. Development coming forward before the heat network is delivered is required to be connection ready, and to connect once the network is in place. Planning conditions and obligations will be applied to other development in order to futureproof connection at a later date.</u></p>	<p><i>Energy Feasibility Study (2018)</i>; and the current status of the Shoreham Heat Network project.</p>	<p>provide background information in relation to the updated Shoreham Harbour District Energy Feasibility Study (2018).</p> <p>The new paragraph states that new development within this character area will be required to connect to the heat network or to be connection ready if it comes forward before the heat network is delivered.</p> <p><b>The amendments are within the supporting text only and are reflected in changes to policy text, as outlined under MM13 below. See MM13.</b></p>
Sub/MM13	CA7 new clauses	Submission	<p>Insert new clauses after (2):</p> <p><u>3. Proposals for sites WH1 and WH2 will be required to demonstrate that potential implications for the safety of navigation have been addressed in agreement with statutory bodies, including Shoreham Port Authority.</u></p> <p><u>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. When the network is constructed, development will be required to connect.</u></p> <p>[Renumber subsequent clauses accordingly]</p>	<p>To reflect recent representations from Shoreham Port Authority on planning applications in the Western Harbour Arm, with potential to impact on port navigation. To reflect the findings of the <i>Shoreham Harbour District Energy Feasibility Study (2018)</i>; and the current status of the Shoreham Heat Network project.</p>	<p>New clause 3 is considered to indirectly positively impact upon the SA objective 11: "Improve health..." as it will ensure the safety of ships and their crew, and also objective17: "promote sustainable economic development..." as will ensure that ships can continue to safely navigate the harbour. Impacts on these objectives were mixed in the previous assessment due to health and economic benefits and implications of the policy, and although this new policy criteria strengthens the positive impact, it is not considered to significantly change the previous score, which is still considered to be mixed. <b>No change to previous SA resulting from this change.</b></p> <p>New clause 4 provides strong support for delivery of Shoreham Heat Network and provides clear policy that all new development within this character area will be required to connect to the network once constructed, or to incorporate necessary infrastructure (e.g. pipework) to provide for future connection. This requirement is considered to impact positively for SA objective 1: "Increase energy efficiency" as will provide a renewable source of heat and therefore help to conserve energy, and SA objective 11: "improve health" as may help to reduce the risk of future fuel poverty for residents. As described under MM10, marine source heat pump infrastructure could resulting changes to water temperature and would require pipework to be installed in the water which could have adverse ecological impacts and potentially have adverse impacts on SA objective 4: "conserve, protect and enhance biodiversity and habitats".</p> <p>Impacts on all these objectives were mixed in the previous assessment due to the amount of development to be delivered within the character area and the consumption of energy that this will result in, due to other health implications arising from the policy, and due to the risk of development in this location on</p>

Main Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are shown in purple text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the <i>Proposed Submission Shoreham Harbour Joint Area Action Plan (2017)</i> unless otherwise stated).	Sustainability appraisal finding (please note that modifications proposed after Submission have not yet been appraised)
					designated sites. The new <b>policy criteria strengthens the positive impact for SA objectives 1 and 11, and increases the risk of adverse impacts against SA objective 4, however they are not considered to significantly change the previous scores for these objectives, which are all considered to be mixed. No change to previous SA.</b>
Sub/MM14	CA7 (11)	Submission	Developments should be set back <u>sufficiently</u> from the A259 corridor to <u>provide space for a high-quality segregated cycle route which provides stepped separation from road vehicles and pedestrian facilities, to deliver green infrastructure improvements, and</u> to prevent a canyoning effect <del>and</del> to ensure that residents are protected from noise and air quality impacts <u>in agreement with the highways and planning authorities.</u>	To respond to an issue raised by Hyde New Build Ltd (Representation: 2017-0402, and to reflect the LPAs proposals for green infrastructure and cycle facility along the A259.	Amended clause 11 is considered to impact positively on SA objective 13: "Promote sustainable transport..." and SA objective 4: "Conserve, protect and enhance biodiversity..." and links strongly to existing clauses 10, which refers to the delivery of a waterfront pedestrian and cycle route, and clause 14 which refers to incorporating trees and vegetation along the waterfront route.  Impacts on all these objectives were mixed in the previous assessment due to the amount of development to be delivered within the character area and the potential for transport movements to increase, due to the risk of development in this location on designated sites. <b>The amended policy criteria strengthens the positive impact for SA objectives 4 and 13, however they are not considered to significantly change the previous scores for these objectives, which are all considered to be mixed. No change to previous SA.</b>
PH/MM16	Policy SH10 (3)	Pre-Hearing	Direct agreements with utility providers may be required to provide <u>infrastructure, such as sewerage infrastructure.</u>	The Councils proposed this as a minor modification (MIN81). However it is included as a main modification in response to the Inspector's Guidance Notes. To address a formatting error whereby the end of the sentence was omitted from the published version of the <i>Proposed Submission Joint Area Action Plan</i> . This omission was raised by Southern Water (Representation: JAAP2017-0601)	Typographical correction. No SA implications.



## 2. Proposed minor modifications to the Proposed Submission Shoreham Harbour Joint Area Action Plan

The schedule below sets out changes proposed to the *Proposed Submission Shoreham Harbour Joint Area Action Plan*, submitted under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

These minor modifications are intended to assist the Inspector in understanding the Council's position.

Minor modifications are generally regarded as textual or grammatical corrections, rephrasing or limited new text to add clarity, or updates to figures or references which are necessary due to alterations which have been made elsewhere or for which there is new information. In all cases the reason for the modification is stated.

A description of modifications to maps is included in the schedule below. The Appendix contains the versions of the maps published in the *Proposed Submission Shoreham Harbour Joint Area Action Plan* (November 2017), and the version incorporating the proposed modification.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are shown in red text. Deleted text shown as struck through and additional text shown as underlined)	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	
Sub/MIN1	1.3	Submission	Who <del>has</del> prepared the plan?	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN2	1.3.1	Submission	The plan <del>was has been</del> prepared by the Shoreham Harbour Regeneration Partnership. This is made up of Adur District Council, Brighton & Hove City Council, West Sussex County Council and Shoreham Port Authority.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN3	1.3.2	Submission	The partnership also works closely with a number of other organisations. These include the Environment Agency, <del>Homes England the Homes and Communities Agency</del> , Highways England, Natural England and Historic England.	The Homes and Communities Agency became Homes England on 11 January 2018.	Not within policy. Typographical correction. No SA implications.
Sub/MIN4	1.3.3	Submission	The plan <del>has been will be</del> jointly adopted by Adur District Council, Brighton & Hove City Council and West Sussex County Council.	Change of tense once adopted. To correct missing punctuation.	Not within policy. Typographical correction. No SA implications.
Sub/MIN5	1.4	Submission	Why <del>was has</del> the plan <del>been</del> prepared?	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN6	1.4.3	Submission	The JAAP will help to generate investment and access funding for improved infrastructure, including sustainable transport, flood defences and sustainable drainage. It <del>will support</del> s the safeguarding of the important function of Shoreham Port, including the importing and handling of aggregates and minerals.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN7	1.4.4	Submission	The plan promotes the port as a hub for renewable energy generation, contributing to national and local carbon reduction targets. The JAAP <del>will</del> also promotes the creation and enhancement of green infrastructure links through the area.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN8	1.5	Submission	How <del>was has</del> the plan <del>been</del> prepared?	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN9	1.5.1	Submission	There <del>were are</del> four stages to preparing the JAAP. <del>The process is at currently at stage 4:</del>	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN10	1.5.1 bullet 4	Submission	<b>Stage 4:</b> Publication of the Proposed Submission JAAP, submission to the Secretary of State for independent examination, followed by formal adoption by the councils (2017 – <del>2019 2018</del> ).	To reflect expected adoption date.	Not within policy. Typographical correction. No SA implications.
Sub/MIN11	1.7.1	Submission	The JAAP is a local plan for the Shoreham Harbour Regeneration Area. The JAAP <del>is will be</del> part of the development plan for both Adur and Brighton & Hove. The Adur Local Plan and Brighton & Hove City Plan Part One designate the regeneration area as a broad location for change.	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are shown in red text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	
Sub/MIN12	1.7.4	Submission	1.7.4 <del>Once adopted, the</del> <u>The</u> JAAP supersedes the following policy documents: <ul style="list-style-type: none"> <li>• <i>South Portslade Industrial Estate and Aldrington Basin Development Brief</i> (2013)</li> <li>• <i>Western Harbour Arm Development Brief</i> (2013)</li> <li>• <i>Shoreham Harbour Interim Planning Guidance</i> (2011)</li> </ul>	Change of tense once adopted.	Not within policy. Typographical correction. No SA implications.
Sub/MIN13	1.7.5	Submission	<del>This version of the plan has been prepared and published in accordance with Regulation 19 of the Town and County Planning (Local Planning) Regulations 2012 for public consultation purposes. The plan sets out the vision and strategic objectives, the policies, and the proposed site allocations. In this plan, the authorities have sought to address the points raised on the Regulation 18 Draft JAAP consultations and points raised in engagement with consultees. The policies in this Proposed Submission plan will be given appropriate weight in the determination of planning applications.</del>	Remove text relating to publication stage of plan preparation.	Not within policy. Typographical correction to reflect current stage. No SA implications.
Sub/MIN14	1.8.1 <u>new footnote</u>	Submission	<u>The UK is expected to leave the EU in March 2019. The European Union (Withdrawal Bill) will convert existing EU law (such as EU regulations and EU decisions) directly in the UK's legal Systems. The Bill will preserve laws made in the UK to implement EU obligations (e.g. the laws which implement EU directives).</u>	To reflect status of EU law once the UK leaves the EU.	Not within policy. Information only. No SA implications.
Sub/MIN15	1.8.7	Submission	<del>The proposals in this plan have also been screened for HRA. The <i>Shoreham Harbour Joint Area Action Plan Habitats Regulations Assessment Screening Report</i> (2018) concludes that a full HRA is not required as there are no significant impacts on protected European sites. As the proposals in this plan are in line with the local plans, the partnership and Natural England have agreed that an HRA is not needed for the JAAP. The <i>Shoreham Harbour Habitats Regulations Statement</i> (2016) sets this out in full.</del>	To reflect updated HRA report.	Not within policy. Information only. No SA implications.
Sub/MIN16	1.9.1 footnote 8	Submission	<u>National Planning Policy Framework</u> (DCLG: 2012). <u>At the time of submission, the Ministry of Housing, Communities &amp; Local Government was consulting on an updated NPPF.</u>	To clarify that an updated version of the NPPF has been published for consultation.	Not within policy. Information only. No SA implications.
Sub/IN17	1.10.10 bullet 5	Submission	<ul style="list-style-type: none"> <li>• policies in the <del>emerging</del> <u>emerging</u> Adur Local Plan and Joint Area Action Plan that recognise the need to enhance green corridors and improve ecological connectivity.</li> </ul>	To reflect adoption of Adur Local Plan.	Not within policy. Typographical correction. No SA implications.
Sub/MIN18	1.10.12	Submission	Marine plans and local plans overlap between high and low water marks. The South Inshore Marine Plan includes the coastline at Shoreham Beach, and Southwick and Portslade-by-Sea. It also includes the Eastern and Western Arms of the River Adur.	To correct typographic error.	Not within policy. Typographical correction. No SA implications.

Minor Modification No:	Reference: (Paragraph, policy or map number)	Stage at which modification proposed	Amendment: (Amendments are shown in red text. Deleted text <del>shown as struck through</del> and additional text <u>shown as underlined</u> )	Reason(s) for amendment (Please note that references to representations refer to those received in response to the Proposed Submission Shoreham Harbour Joint Area Action Plan (2017) unless otherwise stated).	
Sub/MIN19	1.11.3	Submission	Adur District Council <u>adopted</u> <del>will adopt</del> the Adur Local Plan in December 2017. The plan provides a strategy for development in Adur up to 2032. Policy 2 (Spatial Strategy) states: <i><u>“Shoreham Harbour will be a focus for development to facilitate regeneration through delivery of a mix of uses including housing which will be delivered through an Area Action Plan being prepared jointly between Adur District Council, Brighton &amp; Hove City Council and West Sussex County Council.”</u></i> <del>Shoreham Harbour will be the focus of a significant level of development to facilitate regeneration of the Harbour and neighbouring communities, which will be delivered through an Area Action Plan to be prepared jointly between Adur District Council, Brighton &amp; Hove City Council and West Sussex County Council.</del>	To reflect adoption of Adur Local Plan, and update direct quotation from Adur Local Plan.	Not within policy. Typographical correction. No SA implications.
Sub/MIN20	1.11.4	Submission	Policy 8 (Shoreham Harbour <u>Regeneration Area</u> ) sets out the policy and priorities for each character area and states that: <i><u>“The Council will facilitate the delivery of a minimum of 1,100 new dwellings and a minimum of 16,000sqm of employment generating uses (including B1 uses) within that part of the Shoreham Harbour Regeneration Area Western Harbour Arm during the plan period to 2032 (as shown on the Policies Map).”</u></i> <del>“The Council will facilitate the delivery of a minimum of 1,100 new dwellings within the Shoreham Harbour Regeneration Area within Adur District during the plan period to 2032.”</del>	To update direct quotation from Adur Local Plan.	Not within policy. Typographical correction. No SA implications.
PH/MIN1	1.11.10	Submission/ Pre-Hearing	<del>The West Sussex Minerals Local Plan (2003) safeguards a number of wharves at Shoreham Harbour, including some sites proposed for new mixed use development in this plan. The Submission Draft West Sussex Joint Minerals Local Plan (2017) seeks to safeguard sufficient capacity to ensure a steady and adequate supply of minerals whilst supporting regeneration aspirations set out in this document. The plan <b>was adopted in July 2018</b>, has been submitted to government for examination on legal compliance and soundness.</del>	Since submission of the JAAP, the West Sussex Joint Minerals Local Plan has been adopted. This modification clarifies the status of the minerals plan. It is suggested in response to Inspector’s question 25.	Not within policy. Typographical correction. No SA implications.
Sub/MIN22	1.12.4	Submission	<del>Shoreham Port Authority produced the <u>Shoreham Port Masterplan (2010) and Shoreham Port Masterplan Review (2017)</u>. <u>Shoreham Port Masterplan (2016)</u>. Although it is not a statutory planning policy document, the plan sets the port’s future development and must be taken into account when considering new developments in or near the port.</del>	To clarify that the original masterplan was reviewed in 2017.	Not within policy. Typographical correction. No SA implications.
PH/MIN2	2.1.4	Pre-Hearing	Sustainable development “meets the needs of the present without compromising the ability of future generations to meet their own needs”. The planning system contributes to achieving sustainable development. The NPPF identifies three <u>dimensions overarching objectives</u> to sustainable development: • an economic <u>role, contributing to building objective - to help build</u> a strong, responsive and competitive economy • a social <u>role, supporting objective - to support</u> strong vibrant and healthy communities • an environmental <u>role, contributing objective – to contribute to protecting and enhancing the natural, built and historic environment.</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN3	2.1.4 Footnote 15	Pre-Hearing	<del>NPPF (2012) paragraph 6</del> <u>NPPF (2018) paragraph 7</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.

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Sub/MIN23	Objective 1 – 1 <sup>st</sup> paragraph	Submission	To minimise carbon emissions, address the challenges of climate change and create a renewable energy hub.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN4	2.2.2 Footnote 17	Pre-Hearing	<del>NPPF (2012) paragraph 92</del> <u>NPPF (2018) paragraph 148</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN24	Objective 2	Submission	To support a growing, thriving port. To facilitate the delivery of the adopted Port Masterplan, the provision of a modernised, consolidated and sustainable port, and to promote the important role of the Port in the local and wider economy.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
Sub/MIN25	Objective 3 – 2 <sup>nd</sup> paragraph	Submission	To provide new, high quality employment floorspace and improve the business environment to support the needs of local employers. To equip local communities with the training and skills required to access existing and future employment opportunities.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN5	2.2.7	Pre-Hearing	<del>Local planning authorities must plan to meet the development needs of business and support economic growth 18. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development</del> <sup>18</sup> . The proposals in this plan will contribute to providing employment space in the local area.	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN6	2.2.7 Footnote 18	Pre-Hearing	<del>NPPF (2012) paragraph 20</del> <u>NPPF (2018) paragraph 80</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN26	Objective 4 – 1 <sup>st</sup> paragraph	Submission	To provide new homes and contribute to meeting identified housing need.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
Sub/MIN27	Objective 5 – 1 <sup>st</sup> paragraph	Submission	To improve connections and promote sustainable transport choices.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN7	2.2.13	Pre-Hearing	Local plans should promote development at locations that minimise trip generation and encourages the use of sustainable modes of transport. <del>Transport policies can support reductions in greenhouse gas emissions, as well as contribute to wider sustainability and health objective 20. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.</del>	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN8	2.2.13 Footnote 20	Pre-Hearing	<del>NPPF (2012) paragraph 29</del> <u>NPPF (2018) paragraph 103</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN28	Objective 6 – 1 <sup>st</sup> paragraph	Submission	To reduce the risk of flooding and adapt to climate change.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN9	2.2.15	Pre-Hearing	<del>Local plans should direct development away from areas at high risk of flooding. This is determined through the Sequential Test, and if necessary, the Exception Test. All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by applying the sequential test and then, if necessary, applying the exception test.</del>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN10	2.2.15 Footnote 21	Pre-Hearing	<del>NPPF (2012) paragraph 100</del> <u>NPPF (2018) paragraph 157</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.

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Sub/MIN29	Objective 7 – 1 <sup>st</sup> paragraph	Submission	To add to the natural capital of the Shoreham Harbour Regeneration Area by delivering net gains to biodiversity and a multifunctional green infrastructure network.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN11	2.2.17 Footnote 22	Pre-Hearing	<del>NPPF (2012) paragraphs 109; 114</del> <u>NPPF (2018) paragraph 170; 171</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN12	2.2.19 Footnote 23	Pre-Hearing	<del>NPPF (2012) paragraph 73</del> <u>NPPF (2018) paragraph 96</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN13	2.2.20 Footnote 24	Pre-Hearing	<del>NPPF (2012) paragraph 75</del> <u>NPPF (2018) paragraph 98</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN31	Objective 9 – 1 <sup>st</sup> paragraph	Submission	To promote high design quality and improve townscape.	To correct missing punctuation.	No change to objective. Typographical correction. No SA implications.
PH/MIN14	2.2.21	Pre-Hearing	Local plans should include policies that set out the quality of development expected in the area. New development should: <ul style="list-style-type: none"> <li>• <del>function well</del></li> <li>• <del>establish a strong sense of place</del></li> <li>• <del>optimise the potential of the site</del></li> <li>• <del>respond to local character and history</del></li> <li>• <del>create safe and accessible environments</del></li> <li>• <del>be visually attractive<sup>25</sup></del> <ol style="list-style-type: none"> <li>a. <u>function well</u></li> <li>b. <u>be visually attractive</u></li> <li>c. <u>sympathetic to local character and history</u></li> <li>d. <u>establish a strong sense of place</u></li> <li>e. <u>optimise the potential of the site</u></li> <li>f. <u>create safe and accessible environments</u></li> </ol> </li> </ul>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN15	2.2.21 Footnote 25	Pre-Hearing	<del>NPPF (2012) paragraph 58</del> <u>NPPF (2018) paragraph 127</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN32	2.3.10	Submission	Access to Portslade and Southwick Beaches for pedestrians and cyclists will be improved. Habitats and biodiversity will be created and protected.	To correct typographic error.	Not within policy. Typographical correction. No SA implications.
Sub/MIN33	Map 3	Submission	<del>Amendment to boundary of site at Aldrington Basin allocated for Employment (proposed/protected)</del>	To address an issue raised by DMH Stallard on behalf of Hopegar Properties Ltd ( <a href="#">Representation: 2017-1202</a> ). This corrects a drafting error in preparing the maps for the Proposed Submission plan.	Not within policy. Factual correction. No SA implications.
Sub/MIN34	Map 4	Submission	<del>Amendment to boundary of site at Aldrington Basin allocated for Employment (proposed/protected)</del>	To address an issue raised by DMH Stallard on behalf of Hopegar Properties Ltd ( <a href="#">Representation: 2017-1202</a> ). This corrects a drafting error in preparing the maps for the Proposed Submission plan.	Not within policy. Typographical correction. No SA implications.
Sub/MIN35	Map 5	Submission	<del>Amendment to show The Ham as village green. Amend Sites of Nature Conservation Importance (SNCI) to Local Wildlife Sites (LWS)</del>	To show correct designation of The Ham. To reflect current terminology for wildlife sites.	Factual correction to reflect designation. No SA implications.
Sub/MIN36	2.4.7	Submission	There are <del>Local Wildlife Sites Sites of Nature Conservation Importance (LWSSNCIs)</del> at Shoreham Beach and Basin Road South. Shoreham Beach is also a Local Nature Reserve.	To reflect the change in terminology for this designation from SNCI to LWS.	Not within policy. Terminology change only. No SA implications.
Sub/MIN37	2.4.8	Submission	Kingston Beach <del>and The Ham are registered as is a</del> village greens. This safeguards <del>these areas</del> the beach as a public spaces.	To show correct designation of The Ham.	Not within policy. Factual correction to reflect designation. No SA implications.
Sub/MIN38	2.4.9 2 <sup>nd</sup> bullet	Submission	• <del>The Ham, a small recreation ground and skate park in the Western Harbour Arm area</del>	To reflect the inclusion of The Ham in paragraph 2.4.8.	As above.

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Sub/MIN39	3.1 Objective 1 – 1 <sup>st</sup> paragraph	Submission	To minimise carbon emissions, address the challenges of climate change and create a renewable energy hub.	To correct missing punctuation.	Typographical correction. No SA implications.
PH/MIN16	3.1.2	Pre-Hearing	The National Planning Policy Framework (NPPF) states that: <del>“Planning plays a key role in helping to shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”</del>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN17	3.1.2 Footnote 26	Pre-Hearing	<del>NPPF (2012) paragraph 93</del> <u>NPPF (2018) paragraph 148</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN18	3.1.3 Footnote 27	Pre-Hearing	<del>NPPF (2012) paragraph 94</del> <u>NPPF (2018) paragraph 149</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN19	3.1.4 Footnote 28	Pre-Hearing	<del>NPPF (2012) paragraph 97</del> <u>NPPF (2018) paragraph 151</u>	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN40	3.1.13 – 3.1.14	Submission	Amend subheading between paragraphs: <u>Heat networks</u> <del>Potential for district heat network</del>	To reflect current status of Shoreham Heat Network project.	No SA implications.
Sub/MIN41	3.1.19	Submission	Development should demonstrate that the heating and cooling systems have been selected in accordance with the following heating and cooling hierarchy: <u>Change bullets to numbered list</u>	To correct missing punctuation. To clarify that the points are a hierarchy rather than a list of options.	Formatting change. No SA implications.
Sub/MIN42	3.1.20 – 3.1.21	Submission	<u>Add subheading between paragraphs: Wind energy</u>	To reflect content of following paragraphs.	No SA implications
Sub/MIN43	3.2 Objective 2	Submission	To support a growing, thriving port. To facilitate the delivery of the adopted Port Masterplan, the provision of a modernised, consolidated and sustainable port, and to promote the important role of the Port in the local and wider economy.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN44	3.2.4	Submission	The current level of use at Shoreham Port is 700 to 900 ship arrivals per year, which results in a trading throughput of approximately 1.8 to 2 million tonnes per year. The main commodities that are imported and exported at the port are aggregates, timber, scrap metal, cereals, oil and increasingly steel. The <u>Shoreham Port Masterplan Review (2017)</u> <del>(2010)</del> aims to provide the capacity for a 25% increase in trade <u>over the masterplan period by 2026</u> .	Factual update to reflect the wording of the <i>Shoreham Port Masterplan Review</i> (2017).	Factual update. No SA implications.
Sub/MIN45	3.2.5	Submission	The port is a significant local employer <del>providing around 1,700 jobs</del> . <u>There are now over 100 businesses based on the Port and about 1,600 people working on site</u> . Employers range from large multinationals, national firms, through to a variety of small and medium sized firms including motorbike repairs and cheese suppliers. There are now over 100 businesses based on the Port and about 1,600 people working on site	Factual update to reflect the wording of the Shoreham Port Masterplan Review (2017).	Factual update. No SA implications.

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Sub/MIN46	3.2.9	Submission	Shoreham Port Authority's strategy growth is set out in the updated <u>Shoreham Port Masterplan Review (2017)</u> <del>Shoreham Port Masterplan (2016)</del> and involves consolidating port-related uses within the Eastern Arm, Canal and South Quayside. The JAAP aims to promote the masterplan objective of enhancing the port's role in the local community, particularly in terms of jobs and trade growth.	Factual update to reflect the wording of the Shoreham Port Masterplan Review (2017).	Factual update. No SA implications.
PH/MIN20	3.2.14	Pre-Hearing	The NPPF provides protection to mineral wharves, stating that local planning authorities should safeguard existing, planned and potential wharfage for bulk transport of minerals, secondary materials and marine- dredged aggregates <del>(paragraph 143)</del> <u>(paragraph 204)</u> .	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
PH/MIN21	3.2.17	Pre-Hearing	Policy M10 of the <del>Submission Draft</del> West Sussex Joint Minerals Local Plan (2017) <del>8</del> safeguards permanent mineral wharves at Shoreham Port for the purpose of minerals transportation. The policy further safeguards temporary consents granted at New Wharf and Kingston Wharf, to ensure they can continue to operate without prejudice, whilst they have planning permission. The plan states (paragraph 6.10.11) further temporary permissions may be granted for mineral related development at these sites if there is not a conflict with other development plan policies and objectives. These temporary permissions can contribute positively to ensuring a steady and adequate supply of minerals to the area. <u>Safeguarding of these sites will cease once permission expires</u>	Since submission of the JAAP, the West Sussex Joint Minerals Local Plan has been adopted. This modification clarifies the status of the minerals plan and the temporary safeguarding of wharves at Shoreham Harbour. It is suggested in response to Inspector's question 25.	Not yet appraised
Sub/MIN47	3.3 Objective 3 – 1 <sup>st</sup> paragraph	Submission	To stimulate the local economy and provide new jobs.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN48	3.4 Objective 4 – 1 <sup>st</sup> paragraph	Submission	To provide new homes and contribute to meeting housing need.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN49	3.4.10	Submission	The <i>Adur Local Plan (2017)</i> includes Policy <del>33</del> <u>34</u> : Planning for Sustainable Communities that resists the loss of existing community facilities. Also refer to <u>Policy SH10: Infrastructure Requirements</u> <del>SH17: Planning obligations towards infrastructure delivery</del> in this plan.	To reflect adoption of <i>Adur Local Plan (2017)</i> and to correct errors in reference to policies	Factual and typographical correction. No SA implications.
Sub/MIN50	3.5 Objective 5 – 1 <sup>st</sup> paragraph	Submission	To improve connections and promote sustainable transport choices.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN51	3.5.14	Submission	The <i>Shoreham Harbour Transport Strategy</i> identifies a dedicated, safe and continuous cycle facility along the A259 from Wharf Road to <u>Adur Ferry Bridge</u> <del>Surry Hard</del> , 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	Since the Shoreham Harbour Transport Strategy was prepared, Adur District Council has entered an agreement with Sussex Yacht Club to purchase a strip of land along the southern edge of Brighton Road (A259). Although this is primarily to provide a new flood defence wall, it will also enable the construction of a shared footway and cycleway between Surry Hard and Adur Ferry Bridge.	Factual update. No SA implications.
Sub/MIN52	3.6 Objective 6 – 1 <sup>st</sup> paragraph	Submission	To reduce the risk of flooding and adapt to climate change.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN53	3.6.7	Submission	Refer to policies in Part <del>4</del> <u>3</u> of this plan which identify the site-specific flood defence and mitigation measures required within the character areas. Development in the Western Harbour Arm in particular will be required to deliver significant flood risk mitigation infrastructure.	To correct referencing error.	Typographical correction. No SA implications.

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Sub/MIN54	Policy SH6 (9) – (16)	Submission	<p>9. Where pontoons and mooring opportunities are provided as part of delivery of new flood defences, the following requirements apply: -</p> <p><del>10.</del> <u>•</u> Pontoons should be designed to be freestanding structures.</p> <p><del>11.</del> <u>•</u> Where boats are to be moored directly onto piling, a structural survey is required to consider whether defences could take the loading over their expected lifetime.</p> <p><del>12.</del> <u>•</u> Where loss of habitat occurs due to construction of moorings or pontoons, or from boats resting on intertidal habitat, creation of new <u>like for like</u> compensatory habitat will be required.</p> <p><del>13.</del> <u>10.</u> 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. SuDS must also be applied to hard landscaping (including paving and road carriageways).</p> <p><del>14.</del> <u>11.</u> New developments must incorporate open space, appropriate planting, green roofs and/or green walls (suitable for coastal growing conditions) to reduce levels of surface water runoff and consequent risk of flooding.</p> <p><del>15.</del> <u>12.</u> Proposals which seek to provide basement parking in tidal/fluvial flood zones will only be acceptable where adequate mitigation and emergency planning are included as part of the planning application.</p> <p><del>16.</del> <u>13.</u> Proposals must include an emergency strategy to ensure the safety of residents at times of flooding.</p>	<p>To correct an error whereby the criteria in clause 9 were formatted as clauses rather than bullet points. Subsequent clauses are renumbered to reflect this amendment.</p> <p>To respond to an issue raised by the Environment Agency (Late Representation 2017-2002).</p>	Typographical & formatting correction. No SA implications.
Sub/MIN55	3.7 Objective 7 – 1 <sup>st</sup> paragraph	Submission	To add to the natural capital of the Shoreham Harbour Regeneration Area by delivering net gains to biodiversity and a multifunctional green infrastructure network.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN56	3.7.8	Submission	The eastern end of Shoreham Beach <del>Local Wildlife Site Site-of-Nature Conservation Importance (LWSSNCI)</del> falls within Character Area 6: Harbour Mouth. A large part of the <del>LWSSNCI</del> is also designated as a Local Nature Reserve (LNR) whose boundary is adjacent to the regeneration area. The site's main interest is coastal vegetated shingle, an internationally rare and threatened habitat. It also provides a high tide roosting area for wading birds that have fed on the mudflats within the Adur Estuary.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
Sub/MIN57	3.7.9	Submission	Basin Road South <del>LWSSNCI</del> is located at the eastern end of the regeneration area, adjacent to Allocation Aldrington Basin. This site is also designated for coastal vegetated shingle. The Shoreham Harbour Vegetated Shingle Assessment (2015) found that the site is predominantly made up of imported material and has undergone periods of disturbance.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
Sub/MIN58	3.7.10	Submission	The Basin Road South <del>LWSSNCI</del> is 1.1ha in size. The assessment found the extent of vegetated shingle to be 0.43ha (39%) concentrated along the northern and southern fringes. The status of this site will be reviewed through the Brighton & Hove City Plan Part Two. The partnership is working to identify opportunities for coastal vegetated shingle habitat creation at Portslade and Southwick Beaches.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.

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PH/MIN22	3.7.30	Pre-Hearing	In accordance with NPPF <del>paragraph 124</del> <u>paragraph 178</u> , it will be important for development proposals to undertake the necessary risk assessment in line with best practice approaches. All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with most recent guidance.	Factual update to reflect revised NPPF (2018)	National policy. SA not required.
Sub/MIN59	3.7.34	Submission	<del>The East Sussex, South Downs, and Brighton &amp; Hove Waste and Minerals Plan (2013) Brighton &amp; Hove City Council, East Sussex County Council and the South Downs National Park Authority, have adopted a Waste and Minerals Plan (2013) that</del> The East Sussex, South Downs, and Brighton & Hove Waste and Minerals Plan (2013) provides planning policies to guide the management of waste and production of minerals over the plan period to 2026. In addition, the <u>East Sussex, South Downs and Brighton &amp; Hove Waste and Minerals Sites Plan (2017)</u> identifies areas of safeguarding for current and future waste management capacity. This includes areas at Shoreham Port.	To correct references to adopted plans.	Factual correction. No SA implications.
Sub/MIN60	3.7.35	Submission	West Sussex County Council and the South Downs National Park Authority have adopted <del>the</del> <u>a West Sussex Waste Local Plan</u> (2014). The Waste Local Plan covers the period to <del>2031 2032</del> and provides a basis for making consistent land-use decisions for waste management facilities.	To correct factual error.	Typographical correction. No SA implications.
Sub/MIN62	3.8.17 – 3.8.18	Submission	3.8.17 The <u>Adur District Open Spaces Study (2014)</u> <del>was updated in 2014</del> <u>which has provided sets</u> open space provision standards for the district. 3.8.18 For Brighton & Hove, open space standards are set out within the <u>Open Space Update Study (2011)</u> .	To correct formatting so it is consistent with other documents referenced in the plan.	Formatting correction. No SA implications.
Sub/MIN63	3.9 Objective 9 – 1 <sup>st</sup> paragraph	Submission	To promote high design quality and improve townscape.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN64	SH9 (4)	Submission	Where appropriate, contribution will be sought for the provision of public art, in accordance with the scale of development proposed.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN65	Map 7	Submission	<u>Amendment to boundary of site at Aldrington Basin allocated for Employment (proposed/protected)</u>	To address an issue raised by DMH Stallard on behalf of Hopegar Properties Ltd ( <u>Representation: JAAP2017-1202</u> ). This corrects a drafting error in preparing the maps for the Proposed Submission plan.	Typographical correction. No SA implications.
PH/MIN23	4.2.30	Pre-Hearing	Aldrington Marina (Site AB2 - see Map 7) is on the southern side of Basin Road North, between Maritime House and Hove Enterprise Centre. <del>The site is currently let as storage space.</del> Development for high quality, modern employment floor space will be encouraged.	Factual update. Modification proposed in response to Inspector's question 48.	Not yet appraised
Sub/MIN66	4.4 Area priorities	Submission	<ul style="list-style-type: none"> <li>To seek improvements to the quality, access, appearance and maintenance of the public right of way, beach promenade, public areas and beach environment.</li> <li>To support the delivery of the England Coast Path along the beaches.</li> <li>To protect and enhance important habitats and species, such as coastal vegetated shingle as part of a green corridor along the beaches.</li> </ul>	To correct missing punctuation.	Typographical correction. No SA implications.

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Sub/MIN67	4.4.4	Submission	At the eastern end of Portslade beach is Basin Road South <u>LWSSNCI</u> ; designated for coastal vegetated shingle. This site is part of the operational port and remains in active use. Vegetated shingle covers less than half of the site and is not considered to be an outstanding example of its type. However it is the largest example of this habitat within Brighton & Hove.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
Sub/MIN69	4.5.17	Submission	Surface water flooding is also a risk to the site as it can result in pollution to water. <del>and development</del> <u>Development</u> in this location will need to take this flood risk constraint into consideration.	To improve sentence syntax.	Typographical correction. No SA implications.
Sub/MIN70	CA5 (6)	Submission	Development should respect and connect with surrounding areas. Where appropriate, proposals will be expected to enhance townscape around key linkages and junctions, in particular pedestrian and cycle routes from Southwick station and Southwick Green across the lock gates to the beaches, and an improved alignment of the Nautilus House access road serving Allocation Southwick Waterfront and the dry dock.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN72	4.6.7	Submission	The beach itself is designated as a Local Nature Reserve (LNR) and <u>Local Wildlife Site Site of Nature Conservation Importance (LWSSNCI)</u> . The designating feature of the LNR is its rare and beautiful flowering vegetated shingle that has adapted over time to the harsh conditions.	To reflect the change in terminology for this designation from SNCI to LWS.	Typographical correction/update. No SA implications.
Sub/MIN73	4.7.6	Submission	A number of the premises along Brighton Road (A259) are coming to the end of their useful life and are no longer ideally suited for modern business needs; either requiring significant investment on-site, or relocation to a better facility elsewhere.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN74	Map 12	Submission	<u>Add village greens (Kingston Beach and The Ham) to map.</u>	To clarify the status of the open spaces.	Typographical correction/update. No SA implications.
Sub/MIN75	4.7.10	Submission	The Western Harbour Arm is subject to a number of environmental constraints which need to be taken into account when planning for the area. These include: <ul style="list-style-type: none"> <li>Proximity to the Adur Estuary, a Site of Special Scientific Interest (SSSI).</li> <li>Proximity to Shoreham Beach, a Local Nature Reserve (LNR) and <u>Local Wildlife Site Site of Nature Conservation Importance (LWSSNCI)</u>.</li> <li>Shoreham-by-Sea Air Quality Management Area (AQMA) that covers the town centre and the western part of the Western Harbour Arm.</li> <li>A municipal waste site.</li> <li>A metal recycling facility. It is proposed that this be relocated</li> <li>A Health and Safety Executive (HSE) Consultation Zone which determines the distance for different types of development from a 'major hazard' based on the current gas storage use. It is proposed that this be relocated.</li> <li>The presence of contaminated land.</li> <li>The presence of underground water mains and sewers. This infrastructure needs to be protected and new development needs to ensure its operation remains unaffected.</li> </ul>	To reflect the change in terminology for this designation from SNCI to LWS.	Update to reflect current status of development in this location. No SA implications.
Sub/MIN76	4.7.39 – 1 <sup>st</sup> bullet	Submission	<ul style="list-style-type: none"> <li>WH1: 5 Brighton Road. <u>Adur District Council has received an application for full planning permission for 136 dwellings. This site has been purchased by a housing developer. The council is currently engaged in pre-application discussions.</u></li> </ul>	Factual update concerning planning application AWDM/1979/17 received by Adur District Council.	Update to reflect current status of development in this location. No SA implications.

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Sub/MIN77	4.7.39 – 5 <sup>th</sup> bullet	Submission	<ul style="list-style-type: none"> <li>WH5 – Free Wharf. <u>Adur District Council has granted full planning permission for a development comprising 540 dwellings and over 2,700m<sup>2</sup> commercial floorspace. This site has been purchased by a housing developer. The council is currently engaged in pre-application discussions for a mixed use development.</u></li> </ul>	Factual update concerning planning application AWDM/1497/17 received by Adur District Council.	No SA implications.
Sub/MIN78	4.7.55	Submission	Despite popular demand, the harbour is currently lacking in good quality, modern waterfront facilities for boat-users and for local residents and visitors to enjoy. It is proposed to increase the number of berths in the harbour for both visitors and <del>new</del> residents through the incorporation of new publicly accessible quays or floating docks/pontoons linked to new developments and open spaces. This will significantly improve the facilities on offer for the boating community and attract visitors <u>into</u> <del>in to</del> the area, supporting the local economy. All new features would be subject to the appropriate environmental approvals processes with the relevant statutory bodies.	To address an issue raised by Shoreham Rowing Club (Representation: JAAP2017-1501h).	Typographical correction. No SA implications.
Sub/MIN79	5.1.3	Submission	Progress on project work is overseen by a Project Board of senior officers and key stakeholders that meets every quarter. In turn, the Project Board reports back to a Leaders' Board comprising the leaders of each council and the Chief Executive of the Shoreham Port Authority. Key decisions are taken through the relevant committees of each authority.	To correct missing punctuation.	Typographical correction. No SA implications.
Sub/MIN80	5.1.8 – 3 <sup>rd</sup> bullet	Submission	<ul style="list-style-type: none"> <li>Communications activities to maintain a positive two-way dialogue with land owners, developers and stakeholders; and promote joint working for mutual benefit.</li> </ul>	To correct missing punctuation.	Developer contributions can be sought for green infrastructure, particularly where they have additional benefits such as providing SUDS, connectivity and so on. This amendment further strengthens the SA assessment against SA objective 6: Protect, enhance, and improve the accessibility of public open space and green infrastructure". However does not change the SA score.
Sub/MIN81	5.1.20	Submission	The following items of infrastructure are typically likely to be requirements for major developments within the allocated sites: <ul style="list-style-type: none"> <li>Contributions to public transport and highway network improvements</li> <li>Upgraded flood defences integrated with public waterfront walking / cycle route (where appropriate – particularly Western Harbour Arm Waterfront sites)</li> <li>Contributions to social infrastructure</li> <li><u>Contributions to green infrastructure</u></li> <li>Remediation of contaminated areas</li> </ul> On-site renewable energy systems / low carbon technologies	To address an issue raised by Sussex Wildlife Trust (Representation: JAAP 2017-1015). The consultee does not suggest that the plan is unsound. However, the proposed amendment clarifies the requirement for development to contribute towards green infrastructure provision.	Developer contributions can be sought for green infrastructure, particularly where they have additional benefits such as providing SUDS, connectivity and so on. This amendment further strengthens the SA assessment against SA objective 6: Protect, enhance, and improve the accessibility of public open space and green infrastructure". However does not change the SA score.
PH/MIN24	5.1.25	Pre-Hearing	The local authorities undertake ongoing monitoring of their Local Development Frameworks of which this JAAP is a part. Progress on the delivery of the key opportunity development sites will be contained with the Authority Monitoring Report (AMR) for each respective council. <u>The AMRs will also include the housing trajectory for Shoreham Harbour Regeneration Area.</u>	To add reference to the housing trajectory. Suggested in response to Inspector's question 35.	Not yet appraised



