

Summary of changes to the JAAP document

Introduction

The councils last consulted on the Draft JAAP in 2014. Since that time the policy context and evidence base has changed, and a number of additional priorities have emerged. Several different officers have worked on individual sections of the document. A version of the JAAP was circulated to officers of the project partners in January 2016. This brought together these changes. Feedback from officers has been incorporated into the document in its current form. The summary below presents the main changes to the document from the 2014 draft to present. A more detailed account of changes will be available for the purposes of sustainability appraisal of the plan.

General notes

Format of document:

The 2014 document was divided into four chapters. These were:

1. Introduction and context
2. Harbour vision and character area proposals
3. Harbour-wide policies
4. Delivery and implementation

The current document is divided into five chapters:

1. Introduction
2. Spatial strategy
3. Area-wide policies
4. Character area proposals
5. Delivery and implementation

This format separates the spatial strategy from the character area proposals. This allows a much clearer summary of what is actually proposed in the plan. The spatial strategy section sets out the vision for the regeneration area, the objectives of the project and a short description of the main proposals in each character area. It also includes the constraints on development. This was included in Section 1 of the 2014 document. Placing the area-wide policies ahead of the character area policies creates a more logical order to the plan and will allow for reduction of repetition later on if necessary.

Objectives:

Both documents include nine objectives. Two of these have changed significantly.

In the 2014 document, objective 1: Sustainable Development addressed the environmental sustainability of new development, including renewable energy. This is not consistent with the definition of sustainable development in the National Planning Policy Framework. Sustainable development has environmental, economic

and social dimensions. It has therefore been included as an overarching theme for the entire plan. Objective 1 has been renamed: Climate change, energy and sustainable building. This better reflects the content of policies under this objective and is in line with terminology in the relevant local plans.

In the 2014 document, objective 7: Nature Conservation sought to conserve the protected sites (SSSI, SNCIs) in the area. However this did not adequately address the non-protected sites. Since 2014 further ecology and biodiversity studies have identified potential for a green infrastructure network throughout the harbour area, and the partnership has committed to preparing a green infrastructure strategy. The objective has therefore been renamed: Natural environment, biodiversity and green infrastructure.

Policy numbering:

Following consultation in 2014, new policies were added to the document. Some of these were very short, and this led to a large number of policies overall. In the January 2016 version these were combined to create single policies for each character area, and for each objective. This meant that some of the policies were overly long. In the current version there is a main policy heading for each character area and objective. There are also a number of sub-policy headings. For example, section 3.3 is on economy and employment. The main policy heading is:

- SH3: Economy and employment – this sets out the overall amounts of employment generating floorspace and the general approach. This is supplemented by the following sub-policy:
 - SH3.1 – Retail uses – this specifically addresses the provision of retail in the regeneration area.

Similarly, section 4.2 is on character area 2 – Aldrington Basin. The main policy is:

- SH11: Aldrington Basin – this includes the allocation of sites, appropriate land uses and general principles of development. The sub policies deal with the specific topics relevant to this area:
 - SH11.1 – Flood risk management
 - SH11.2 – Sustainable building
 - SH11.3 – Green infrastructure and open space
 - SH11.4 – Transport

Changes by chapter

Chapter 1 – Introduction:

This section has changed the most. The current version is intended to be clearer, presented more logically and to avoid unnecessary repetition with later sections of the plan. The language has also been modified where possible to provide a more readable account for those unfamiliar with planning terminology. The table below summarises the revised content.

Section in 2016 JAAP	Notes
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Appendix 2 – Summary of changes to the JAAP

1.1 What is the Joint Area Action Plan (JAAP)	This expands on paragraph 1.1.1 of the 2014 document. It gives a clearer description of what the JAAP is and how it will be used.
1.2 Where is the Shoreham Harbour Regeneration Area	In the 2014 document, description of the location was spread across several sections. This section includes both the location in the regional context, and a more detailed description of local context. This includes some of the information included in the 2014 section 1.9 – About the area – drivers for change.
1.3 Who prepared the plan?	This section puts the role of the partnership up front, and explains the joint adoption of the plan. In the 2014 document this information was spread across several sections.
1.4 Why was the plan prepared	These sections have been adapted from 1.5 Why is the Joint Area Action Plan being prepared? The current version updates this information, and separates the reasons for the plan, from the process involved.
1.5 How was the plan prepared?	
1.6 How was the community involved?	The 2014 document included information specific to that consultation period. This version sets out the general approach to consultation and will remain relevant throughout the plan making process.
1.7 What is the status of the JAAP?	The 2014 version did not make sufficiently clear that the JAAP is a local plan (or development plan document) in its own right.
1.8 European policy	These sections have been updated and revised with current relevant legislation and policy. In particular, the Brighton & Hove City Plan has now been adopted,
1.9 National policy	
1.10 Sub-regional policy	
1.11 Local policy	

<p>1.12 Shoreham Harbour policy</p>	<p>and the Adur Local Plan is nearing submission. Additional detail has been included on the Shoreham Port Masterplan. The Flood Risk Management Guide has now been adopted by Adur and Brighton & Hove councils. The Shoreham Beach Neighbourhood Plan and the emerging Shoreham Harbour Green Infrastructure Strategy have been added. European legislation is currently included as this remains in force, although this will be modified at a later date if required.</p>
<p>1.13 Which policies does this plan replace</p>	<p>A local plan is legally required to directly state which policies and plans it replaces.</p>

The summary of JAAP proposals has been removed as this is now included in Chapter 2. The character area map has also been moved.

There is no equivalent to 2014 section 1.9: About the area – drivers for change. Much of this information was repeated in descriptions of the individual character areas. The map of environmental constraints was not accompanied by supporting text. This has now been moved to Chapter 2.

Chapter 2 – Spatial strategy:

This new chapter is intended to provide a clearer and more succinct summary of what is actually included in the plan. It expands on 2014 sections 2.1 and 2.2, and includes a summary of proposals in relation to each objective and character area.

Section in 2016 JAAP	Notes
2.1 What is the vision for Shoreham Harbour?	This vision itself is unchanged. The section now includes sustainable development as an overarching theme. (see note on objectives above)
2.2 What are the objectives of the regeneration project?	1. Renamed Climate change, energy and sustainable building. The objective has been expanded to more directly address zero and low-carbon energy generation. (see note on objectives above) 6. Flood risk – modified to remove reference to specific documents as these may change and add reference to delivering comprehensive flood defence infrastructure. 7. Renamed Natural Environment. Content modified to reflect emerging green infrastructure work, designation of Biosphere and habitat creation (see note on objectives above)
2.3 What is proposed in the plan?	This summarises the proposals for each character area. It includes information previously in Chapter 1 of the 2014 plan.
2.4 What are the constraints in the regeneration area?	The 2014 plan included a map of constraints, but did not have supporting text.

The 2014 version included policy JAAP 1: Spatial Strategy. This required all proposals and projects to consider and contribute to the vision, objectives and aspirations of the spatial strategy. This policy had little content or purpose, as the plan is intended to be read as a whole. It has therefore been removed.

Chapter 3: Area-wide policies

Changes to the strategic objectives have been addressed above.

Section in 2016 JAAP	Notes
3.1 Climate change, energy and sustainable building	Background text revised and updated. Reference to Code for Sustainable Homes removed. Further revision to this section will move pollution related section to Natural Environment as this better fits the content and objections. Additional text and sub policy on district heating and cooling to reflect the Shoreham Harbour Heat Network Study.

	Clauses on water use updated.
3.2 Shoreham Port	Updated and additional text on Shoreham Port. Extract of GPDO removed. Section on minerals wharfs updated to reflect current position.
3.3 Economy and employment	Added reference to start up units and LEP skills strategy. Employment floorspace figures revised
3.4 Housing and community	Section on social and community infrastructure requirements for Western Harbour Arm moved to Character Area 7. Number of dwellings amended to reflect City Plan.
3.5 Sustainable travel	Transport section revised and updated to reflect Transport Strategy.
3.6 Flood risk	Flood risk management section revised, updated and expanded. Added reference to Flood Risk SPD and proposed solutions for each strategic site
3.7 Natural environment, biodiversity and green infrastructure	Section revised, updated and extended. New paragraph relating to Biosphere New paragraph on compensatory habitat and biodiversity improvements and proposed GI strategy New section on designated sites and habitats New section on green infrastructure and wildlife corridors. Reference added to NCN2, England Coastal Path and north-south links to the regeneration area Policy renumbered Added clause on preparation of GI strategy Added clauses on GI network priorities and open space
3.8 Recreation and leisure	Minor amendments. Approach to offsite open space provision set out.
3.9 Place making and design quality	Minor amendments.

Chapter 4: Character Area Proposals

Each character area section follows a similar format. This sets out the area priorities, and includes a description of the area. After this specific subsections address the relevant topics for that area. These include:

- Utilities
- Transport and connections

Appendix 2 – Summary of changes to the JAAP

- Environmental considerations
- Historic assets
- Flood risk management
- Green infrastructure
- Development opportunities
- Social and community infrastructure

Maps of the character area proposals have not yet been updated. However, this will take place before the consultation on the revised JAAP.

Appendix 2 – Summary of changes to the JAAP

Section in 2016 JAAP	Notes
4.1 CA1 – South Quayside	<p>Revised section on utilities includes Edgeley Green Power Station, wind turbines and potential for district heating.</p> <p>Policy SH10: South Quayside includes additional clauses on promoting the area as a hub for renewable energy and promoting the delivery of the Shoreham Harbour Heat Network.</p>
4.2 CA2 – Aldrington Basin	<p>Additional area priority on biodiversity and green infrastructure. A new section on green infrastructure proposals added.</p> <p>Additional paragraphs on flood risk management. Added reference to Flood Risk SPD.</p> <p>Policy SH11 allocates sites for redevelopment and includes specific use classes. The number of dwellings is reduced from 400 to 300 (with CA3) in accordance with City Plan. Sub policies address sustainable building, green infrastructure and open space and transport.</p>
4.3 CA3 – North Quayside and South Portslade	<p>Additional area priorities on intensifying land use, biodiversity and green infrastructure. Added reference to safeguarding port/employment uses. Transport and flood risk sections revised and updated. Added reference to Flood Risk SPD.</p> <p>Policy SH12 allocates sites for redevelopment and includes specific use classes. The number of dwellings is reduced from 400 to 300 (with CA2) in accordance with City Plan. Sub policies address flood risk management sustainable building, green infrastructure and open space and transport.</p> <p>Allocation of specific sites has been adjusted to remove unsuitable residential sites, and to include alternative sites suitable for residential development.</p>

Appendix 2 – Summary of changes to the JAAP

<p>4.4 CA4 – Portslade and Southwick Beaches</p>	<p>Additional priority on supporting England Coast Path. Reference to SNCI changed to refer to vegetated shingle corridor along beaches. Policy SH13 includes new clauses relating to England Coast Path, habitat creation and compensatory habitat.</p>
<p>4.5 CA5 – Fishersgate and Southwick</p>	<p>This character area has been renamed to avoid confusion with the Southwick Waterfront allocation, and as it includes the Southwick council housing estates, which are not on the waterfront. Lady Bee Marina and Southwick Waterfront are separated in the allocation. Added priorities on supporting improvements to social housing, and on green infrastructure and open space. Section on transport revised and updated. New section on flood risk management and reference to SPD. Policy SH14 allocates site for redevelopment. Sub policies address flood risk management, sustainable building, community, green infrastructure and open space and transport.</p>
<p>4.6 CA6 – Harbour Mouth</p>	<p>Additional priorities relating to exploring options for Albion Street Lorry Park, and supporting Adur Homes to redevelop Albion Street housing sites. Additional clauses in Policy SH15 to address these issues.</p>

<p>4.7 CA7 – Western Harbour Arm</p>	<p>Area priorities include reference to allocation and specific land uses. Added priorities on intensifying land use, green infrastructure and open space, and England Coast Path. New section on flood risk management, including reference to SPD. New section on green infrastructure, open space and biodiversity. Revised and extended section on waterfront route. Reference to use as a street and bus route removed. Additional sections on waterfront features and facilities and community infrastructure. Section on development form and type revised. Slightly taller building heights are now considered acceptable in the central parts of deeper sites. The waterfront and Brighton Road frontages should be up to 5 storeys. New clauses in Policy SH16 designate site and land uses. Sub policies address flood risk management, sustainable building, green infrastructure and open space, marine environment and transport.</p>
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Chapter 5: Delivery and implementation

This section has been updated to reflect the current position. Further update will be required as the project develops and nears submission.

Further outstanding revisions

Evidence base:

The partnership is continuing to update the evidence base to support the plan. Current work includes:

- A Whole plan viability study
- Update to the Transport Strategy to reflect the latest study and revised development contributions
- Tall buildings and townscape assessment for the Western Harbour Arm – including the Adur Civic Centre site.

Maps:

The maps have not yet been updated to reflect the current policies. This work will be carried out before the consultation.

