

Shoreham Cement Works Area Action Plan

Sustainability Appraisal / Strategic
Environmental Assessment

SCOPING REPORT

September 2018

Introduction

The South Downs National Park Authority (SDNPA) is required to ensure that sustainable development is promoted throughout a plan's preparation. To assist in this process the SDNPA must prepare a report assessing the sustainability of plans it prepares through undertaking a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA). The aim of the report is to make a plan more sustainable and more responsive to its environmental effects, by identifying its likely significant environmental, social and economic impacts and ways of minimising its negative impacts. To be effective, the appraisal process must be fully integrated into the plan making process and applied at each stage of document production. It will also be used to monitor the effectiveness of the plan during its implementation.

Information

The aim of a Sustainability Appraisal (SA) is to promote sustainable development by assessing how well or otherwise a plan will help achieve environmental, economic and social objectives.

To undertake the SA/SEA process the following five stages should be completed:

Information

A Strategic Environmental Assessment or SEA is an assessment required when preparing a Plan to ensure that a high level of protection is given to the environment.

Stage A - Setting the context and objectives, establishing the baseline and deciding the scope;
Stage B - Developing and refining alternatives and assessing effects;
Stage C – Preparing the sustainability appraisal report;
Stage D – Seeking representations on the sustainability appraisal report; and
Stage E – Post adoption reporting and monitoring.

This **Scoping Report** forms the first stage, Stage A and is split into 5 areas of work as outlined in the table below. The aim is to bring together the evidence base early in the plan-making process in order to identify significant problems, act as a base for future assessment, monitor the effects and inform the identification of reasonable alternatives to what is being proposed.

A1: Identifying other relevant plans, programmes and sustainability objectives;
A2: Collecting baseline information;
A3: Identifying sustainability issues and problems;
A4: Developing the SA framework which will be used to test policy and allocation options in the plan;
A5: Consult the consultation bodies on the scope of the sustainability appraisal report

It is usual practice to combine the processes of SEA and SA, as they share a number of similarities. Whilst there are formalised approaches for both SA and SEA, only through the SEA is there a legal obligation to perform certain activities.

Compliance with the SEA Directive

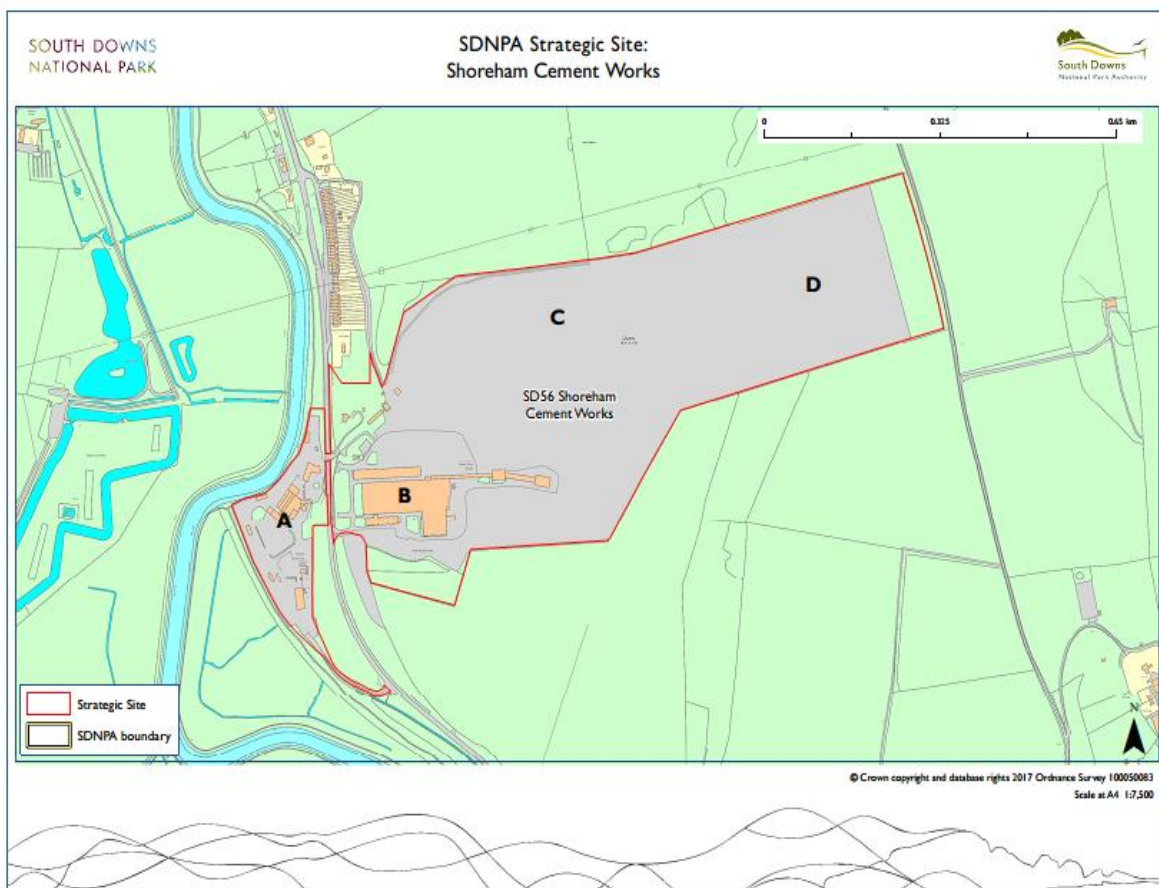
Where this report addresses the requirements of the SEA Directive, for clarity this will be set out in a box like this.

The Shoreham Cement Works site and Area Action Plan

Compliance with the SEA Directive

Outline the contents, main objectives of the plan and relationship to other plans (Annex I (a) of the Directive)

Shoreham Cement Works is a 44ha site including a semi-derelict cement works, inactive chalk quarry, temporary inert recycling facility and a mix of temporary business uses. The site is located about 5km north of Shoreham and 2km south of Upper Beeding.



Large-scale cement production began on the site at the end of the 19th Century. The buildings were completed in 1948-50, permission having first been granted for chalk extraction in 1946. Chalk extraction and cement production ceased in 1991, but the permission (for Area C) was kept alive by an application for registration of the old mining permission in 1992. This extant permission for the extraction of chalk runs to 2042, when a basic restoration scheme would have to be implemented.

Existing use rights exist for general industrial uses within existing buildings and for associated uses (such as storage) taking place in the open air. Areas A and B can be classed as brownfield land, but not Areas C and D, since minerals sites are excluded from the National Planning Policy Framework (NPPF) definition of previously developed land.

The whole site is in single private ownership and the SDNPA is the sole Local Planning Authority.

The site lies across the boundary of Adur District (west of the A283) and Horsham District (east of the A283). Prior to the creation of the SDNPA in 2011, the site was allocated for a mix of uses in the Horsham District Core Strategy (2007) and in the Horsham District Site Specific Allocations Development Plan Document (2007). As part of the site is within Adur District, it was also identified within the Adur Local Plan (1996) for leisure and recreation uses. However, since 2011 the South Downs National Park Authority has been the relevant planning authority and therefore the entire site is addressed within the emerging South Downs Local Plan. Saved policies from the Adur and Horsham plans still apply in this area, until superseded by the South Downs Local Plan.

Upper Beeding Parish Council is preparing a **Neighbourhood Plan**. The Parish covers a large proportion of the Cement Works site. Although policies regarding the future planning of the site will not be included within their plan, they do set out a large number of ideas for the site based on local community consultation and support a regeneration scheme.

The Area Action Plan

The Cement Works site is identified in the emerging **South Downs Local Plan (Policy SD56)** as an area of significant opportunity for a mixed use development which delivers a substantially enhanced landscape and uses that are compatible with the purposes of the National Park. To help to achieve this the SDNPA has started work on an Area Action Plan (AAP) for the site, with the overall aims of:

- a) enhancing the visual impact of the site from both the nearby and distant public viewpoints;
- b) conserving, enhancing and providing opportunities for understanding the biodiversity, geodiversity, historic significance and cultural heritage of the site;
- c) ensuring the delivery of Ecosystems Services; and
- d) ensuring that the design of any development is of the highest quality and appropriate to its setting within a National Park.

The full text of Policy SD56 is contained in **Appendix I**.

The Shoreham Cement Works AAP is the second Development Plan to be prepared by the SDNPA as part of the South Downs Local Plan (SDLP) and will follow the anticipated adoption of the Authority's Local Plan in early 2019. Drawing on existing and new evidence, along with input from the site owners and the local community, the AAP will address in more detail the constraints and opportunities present. These include land restoration, environmental impacts, transport, flood risk, cultural and heritage possibilities, design considerations, viability (including identifying possible partnership funding to enable delivery of a scheme) and phasing of delivery over a number of years.

Stage A1 – Identify relevant plans, programmes and sustainability objectives

Compliance with the SEA Directive

The environmental protection objectives established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation (Annex I (e) of the SEA Directive)

A plan will be influenced in various ways by other plans or programmes and by external objectives such as those laid down in policies or legislation. Table A1 illustrates the key and most influential plans, programmes or policies (PPPs) likely to influence the approach taken to redevelop the Shoreham Cement Works site. This list does not repeat many of the higher level regional / national or international plans that have already been considered through the preparation and appraisal of Policy SD56 of the Local Plan.

The South Downs Local Plan and this AAP sets out how the National Park Authority will manage development of the site over the next 15 years or so. This is guided by the statutory purposes and duty for national parks as specified in the Environment Act 1995 which underpins all the work of the National Park and is the most influential of all policies.

The National Park purposes are:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

The National Park Authority also has a duty to seek to foster the economic and social well-being of the local communities within the National Park.

Table A1.1: Most influential Plans, Programmes and Policies

Plan	Key issues / messages
National and Sub-Regional	
National Planning Policy Framework (2018)	<i>Set out under each topic in subsequent baseline section.</i>
Vision and Circular on English National Parks and the Broads (2010)	Provides guidance to national park authorities on how to achieve their purposes and duty. Further details are set out under each topic in subsequent baseline section.
DEFRA 25 Year Environment Plan	A plan to improve the UK's air and water quality and protect threatened plants, trees and wildlife species. It establishes an extensive set of targets and objectives.
South Downs Local Plan (Submission version 2018)	<i>Set out under each topic in subsequent baseline section.</i>
South Downs National Park Partnership Management Plan	The South Downs Local Plan builds on the framework of the South Downs National Park Partnership Management Plan (PMP). The PMP sets out an overarching strategy for the management of the National Park under three themes;

	A thriving living landscape; People connected with places; Towards a sustainable future. Further details are set out under each topic in subsequent baseline section.
WSCC, 2011. The West Sussex Transport Plan 2011-2026	The West Sussex Transport Plan 2011-26 (LTP3) sets the strategy for guiding future investment in highways and transport infrastructure. The Plan includes four strategies that guide the approach to maintaining, managing and investing in transport.
WSCC, 2016. West Sussex Walking and Cycling Strategy 2016 - 2026	The West Sussex Walking and Cycling Strategy is designed to complement the Government's emerging Cycling and Walking Investment Strategy and sets out the County Council's aims and objectives for walking and cycling together with our priorities for investment in infrastructure improvements.
Sussex Biodiversity Action Plan	The Sussex BAP was created by the Sussex Biodiversity Partnership and focuses specifically on the habitats found within the Sussex region and links to those relevant sections of the UK BAP. Linked to this is the identification and establishment of plans for biodiversity opportunity areas.
South Downs Habitats Regulations Assessment of the South Downs Local Plan	The objective of the assessment is to identify any aspects of the Local Plan that would cause an adverse effect on the integrity of Natural 2000 sites, otherwise known as European sites (Special Areas of Conservation / Special Protection Areas) and Ramsar sites, either in isolation or in combination with other plans and projects; and, to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.
South Downs Tourism Strategy 2015 - 2020	The National Park has approximately 46 million visitor days per year, making it the most popular Protected Landscape in the country which generates an income of nearly £5 billion and supports some 12,000 jobs. The strategy establishes 7 sustainable tourism objectives which address the following: <ul style="list-style-type: none"> • the visitor experience and offer; • visitor pressures; • sustainable practice by tourism providers; • visitors means of access to the National Park and fostering custodianship; • visitors contribution to the local economy.
Local	
Adur Local Plan 1996 (saved policies)	Policy DPAR4 covers Shoreham Cement Works until such time as it is replaced by policies in the South Downs Local Plan.
Horsham District Core Strategy 2007	Policy CP 10 Employment Provision supports restoration of the site as part of a package potentially including leisure development. This policy remains until such time as it is

	replaced by policies in the South Downs Local Plan.
Upper Beeding Neighbourhood Development Plan	Sets a series of objectives / wishes from the community for development of the site as well as a range of policies covering the parish. Consultation on the Regulation 14 draft plan concluded in August 2018.
Steyping Neighbourhood Development Plan	Looks at the key opportunities and issues within the Steyping area. It is at early stages in its preparation.

Initial identification of Sustainability Objectives

The SA for the emerging South Downs Local Plan listed 12 objectives and a number of sub-objectives as set out below. Since the emerging South Downs Local Plan fully encompasses the extent of this AAP it provides a valuable starting point in identifying relevant sustainability objectives. The direct relevance of a number of the objectives to the AAP is varied and therefore they will be adapted, excluded or subsumed within others in order to form the new set against which the AAP is tested.

Table AI.2: South Downs Local Plan Objectives

Sustainability topic	South Downs Local Plan SA Objective	Sub-objective
Landscape	To conserve and enhance landscape character.	<p>1.1: Provide resilience to the landscape character in response to climate change.</p> <p>1.2 Extend the area of dark night skies and the assessed tranquillity of the National Park.</p> <p>1.3 Seek to meet the 'Broad Management Objective and Landscape Guidelines' set out in the South Downs Integrated Landscape Character Assessment.</p>
Climate Change Adaptation	To ensure the SDNP communities are prepared for the impacts of climate change.	<p>2.1: Minimise the risk of flooding to new development through application of the sequential and exception tests.</p> <p>2.2: Promote the uptake of sustainable drainage systems.</p> <p>2.3: The achievement of integrated coastal zone management.</p> <p>2.4: Address both water resource and demand issues in the context of National Park purposes in partnership with water companies.</p>
Biodiversity	To conserve and enhance the region's biodiversity.	<p>3.1: Maintain a functioning ecological network and improve the resilience of natural systems, flora, fauna, soils and semi-natural habitat.</p> <p>3.2: Conserve, enhance, restore, expand and reconnect areas of priority habitat ('Bigger, better, more and joined').</p>
Cultural Heritage	Conserve and enhance the historic environment, heritage	4.1: Achieve repair and / or enhancement of heritage assets currently identified as "at risk" to the extent that this status no longer applies.

	assets and their settings.	4.2: Help the historic environment adapt to changing conditions arising from climate change (warmer, wetter, infestations etc.)
Cultural Activity	To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism.	5.1: A sustainable tourism strategy that supports recreation businesses.
Health and Wellbeing	To improve the health and well-being of the population and reduce inequalities in health and well-being.	6.1: Optimise the benefits that the natural environment offers to contribute to the health and wellbeing of both residents of the National Park and visitors to the SDNP. 6.2: Use environmental and building standards to ensure that places promote health and wellbeing. 6.3: To contribute to a reduction in all aspects of rural crime through effective enforcement in partnership with other enforcement agencies.
Vitality of Communities	To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	7.1: Supporting communities where children grow up and go to school. 7.2: Supporting and empowering local communities to shape their own community (recognising the value of community and neighbourhood planning). 7.3: Support schemes aimed at extending involvement of all members of society in the SDNP.
Accessibility	To improve accessibility to all services and facilities.	8.1: Encourage the development of appropriate services and facilities in development schemes, based upon local plan evidence, via community rights tools, CIL and direct developer contributions (SI06).
Sustainable transport	To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	9.1: Provide sustainable access to Services. 9.2: Work with other partners to develop a high quality, safe access network and better links between bus and trains and cycling opportunities. 9.3: Minimising the impact of vehicle infrastructure on landscape and communities. 9.4: A sustainable transport infrastructure for 2020 and beyond.
Housing	To ensure that everyone has the opportunity to live in	10.1: Support rural communities by providing affordable housing for local people which meets the needs of communities now and in the future.

	a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.	<p>10.2: Create communities characterised by integrated development which takes account of local housing needs and delivers the widest possible range of benefits consistent with National Park purposes & duty.</p> <p>10.3: To make suitable provision for transit and permanent traveller sites based upon projected need.</p> <p>10.4: Make appropriate provision for the accommodation needs of older generations.</p>
Climate Change Mitigation	To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures.	<p>11.1: Promote appropriate retrofitting and upgrading of the existing housing stock and other buildings informed by the sense of place</p> <p>11.2: Implement policy of zero carbon new build homes by 2016 in accordance with government policy.</p> <p>11.3: Supporting communities with the right low carbon / renewable infrastructure in the right place</p> <p>11.4: Extension of wood planting, where appropriate both for carbon storage opportunities and to provide woodfuel sources.</p>
Rural Economy	To encourage development of the rural economy in a manner that balances agricultural and other business interests to maintain a living, valued landscape.	<p>12.1: Encourage development of appropriate infrastructure throughout the area to encourage small business, communities & tourism in the Park.</p> <p>12.2: Encourage local industry and maintenance of a living cultural skills base that forms part of heritage now and into the future.</p> <p>12.3: Recognise and support core sectors of the South Downs economy such as food production, tourism and land management.</p> <p>12.4: Promote agri-environmental businesses and diversification that focuses on ecosystem services and enhancement of the local supply chain.</p> <p>12.5: Market towns to provide services to the rural hinterland.</p>

Stage A2 – Collecting baseline information and Stage A3 – Identifying sustainability issues and problems

Compliance with the SEA Directive

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. (Annex I (b))

The environmental characteristics of areas likely to be significantly affected. (Annex I (C))

Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated as SPAs and SACs. (Annex I (d))

It is important to identify the current state of the environment in order to judge the impact and effectiveness of the plan during implementation. This is achieved by collecting baseline data that will provide a starting point for predicting and monitoring social, economic and environmental effects and identifying sustainability issues within the area. It focuses on key issues that the plan can have a significant effect on.

The SEA Directive also requires consideration of the likely evolution of the area without implementation of the plan or programme. However, it is important to note that this situation would not result in a policy vacuum as the site is allocated within the draft South Downs Local Plan policy SD56 which sets out an extensive set of criteria that must be met before permission is granted for a development.

The collection of baseline information is grouped by topic and is closely linked to that collected and included in the South Downs Local Plan SA. Each topic follows a similar structure, starting with the policy context and then a summary of key baseline information. Following this are the key sustainability issues and likely evolution without the AAP. Finally gaps in the current evidence base are identified along with source of potential further information.

Landscape

Policy Context

At the national level, the National Planning Policy Framework (NPPF):

- States that in National Parks great weight should be given to conserving landscape and scenic beauty, the conservation of wildlife and cultural heritage (Paragraph 172).
- Gives recognition to the intrinsic character and beauty of the countryside, ensuring that developments respond to local character, integrating new development into the natural environment, protecting and enhancing valued landscapes, setting strategic priorities and criteria based policies for protected landscape areas, identifying and protecting areas of tranquillity, limiting the impact of light pollution on intrinsically dark landscapes, and requiring landscape character assessments.

This is further strengthened by the English National Parks Vision and Circular (2010) which states that in their role as Local Planning Authorities, National Park Authorities are expected to follow and promote with partners and stakeholders the principles of the European Landscape Convention in all decisions and discussions concerning planning, management, and protection.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to landscape character:

- SD4: Landscape Character
- SD6: Safeguarding Views
- SD7: Relative tranquillity
- SD8: Dark Night Skies

The purpose of the policies is to set out how development proposals will be expected to conserve and enhance the various aspects of the landscape character of the National Park. They are derived from national

and international policy and the South Downs National Park Partnership Management Plan (PMP).

Baseline Information

Current evidence base

- South Downs Integrated Landscape Character Assessment (SDILCA) 2011
- Historic Landscape Characterisation 2010
- Viewshed Characterisation Study 2015
- SDNPA Tranquillity Study 2017
- International Dark Sky Association Reserve 2016

The South Downs contains a rich and complex landscape character, with significant local variation and contrast. In total there are 49 local level character areas. Agricultural intensification has resulted in an increase in arable and improved grassland crops, and a decline in species rich chalk grassland. Market forces and visitor pressure are also influencing the landscape and there has been a notable increase in the number of vineyards in recent years.

The open downland is particularly vulnerable to urban edge pressures extending from the heavily built-up areas and coastal fringe adjoining the National Park housing 1.5 million people as well as from the 110,000 people living in the market towns, villages, hamlets and rural areas within the National Park boundary.

The key landscape character areas (see Figure 1) in which the Shoreham Cement Works site lies are the Adur Valley Side (light blue wash), Adur Floodplain (dark blue wash) and Adur to Ouse Open Downs - (yellow wash). Key characteristics of each as relevant to the site are contained in **Appendix 2**.

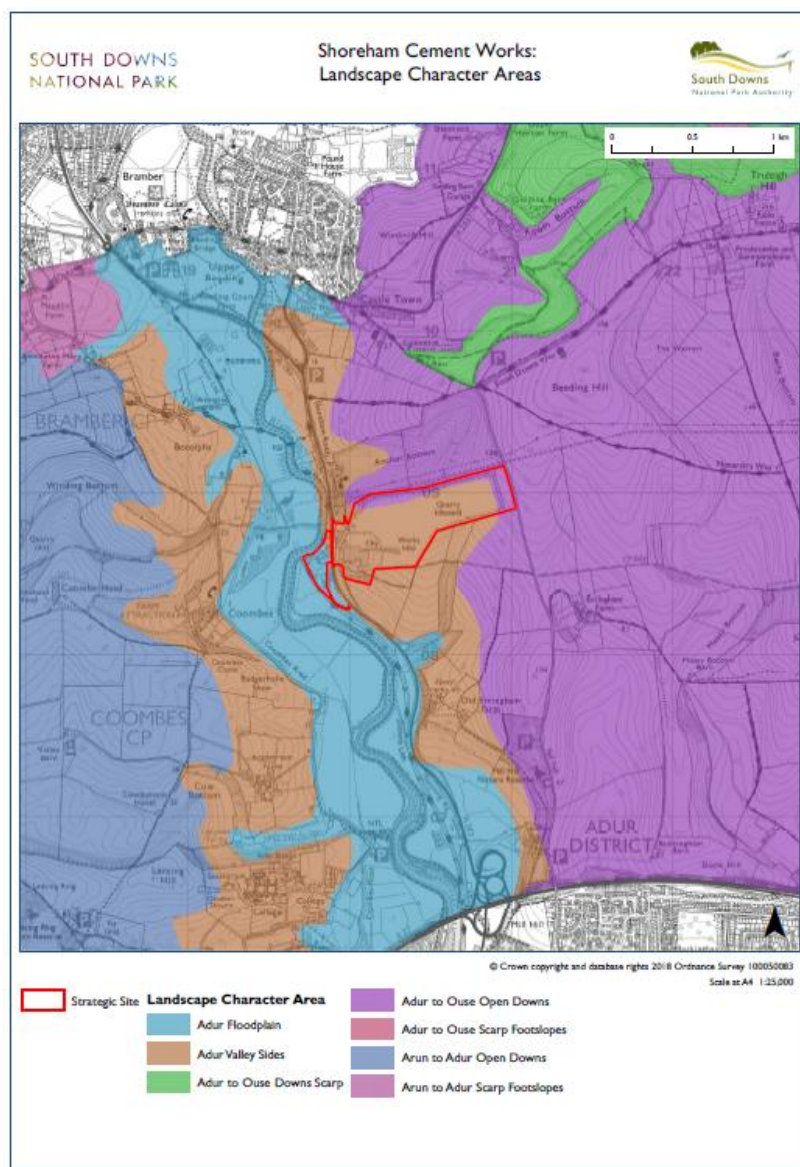


Figure 1 Landscape Character Areas

The **Sussex Historic Landscape Characterisation 2010** study provides an understanding of the historical and cultural origins of today's landscape and the processes of land use change that have shaped it. At the site specific scale it should be used as a first stage in researching a specific site, providing a historic landscape character context. The Shoreham Cement Works site is assessed as having an industrial character. It is surrounded by modern fields, recent enclosures and the valley floor. Anchor Bottom to the north is characterised as unenclosed, containing a nationally rare habitat and often being a relic from a system of traditional land use.

Tranquillity is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it also helps to promote health and well-being. It is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. The **2017 Tranquillity Study** involved an assessment of both positive and negative tranquillity factors which were then scored and mapped. The Shoreham Cement Works area was assessed as having an intermediate level of tranquillity. These are the areas often most vulnerable to change, where further harm should be avoided and every opportunity taken to enhance it.

In 2016 the SDNP was designated as an **International Dark Sky Association Reserve**. The Shoreham Cement Works site sits within zone E1a Intrinsic Rural Darkness which contains some of the darkest areas within the National Park.

Key landmarks in and around the site have been identified at the Cement Works tower and Lancing College to the south.

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Loss of diversity in landscape character.</p> <p>Loss of important features of the historic landscape character.</p> <p>Urban edge and visitor pressures leading to landscape damage.</p> <p>Levels of tranquillity are very vulnerable.</p> <p>Degradation of dark night skies.</p>	<p>The landscape of the South Downs is already highly protected through National and Local Planning policy. This will continue.</p> <p>Market forces will change the form of agriculture with continuing pressure for greater efficiency, larger agricultural structures and changes in land use such as an increase in vineyards.</p> <p>Development of sites close to the National Park boundary in this area will add to the level of activity, visual intrusion, lighting, urbanising features, traffic etc that can be experienced from within the National Park.</p> <p>Urban edge pressures e.g. clutter, rubbish etc will continue.</p> <p>Increasing recreational pressures, including recreational car traffic, demand for new facilities and loss of the feeling of remoteness will continue.</p> <p>The Shoreham Cement Works site will remain in its current use or could be developed in a less favourable manner resulting in reduced landscape restoration and enhancement.</p>

What other evidence will we be collecting?

There is already significant baseline information but a further more detailed site specific landscape assessment incorporating a landscape strategy for the site will be developed as part of the AAP.

Biodiversity

Policy Context

At the national level the NPPF:

- Establishes the need to plan for biodiversity at a landscape scale across local authority boundaries, identifying the local ecological network and promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species population, linked to national and local targets.
- States that the conservation of wildlife and cultural heritage are important considerations in all (protected) areas, and should be given great weight in National Parks and the Broads (Para 172).
- States that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats (.....) unless the need for and benefits of the development in that location clearly outweigh the loss.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to biodiversity:

- SD9: Biodiversity and Geodiversity
- SD10: International Sites
- SD11: Trees, Woodland and hedgerows

The purpose of the policies is to set out a positive strategy to ensure the conservation and enhancement of biodiversity across the National Park; set specific requirements relating to particular SAC / SPA area and ensure the management of existing trees, woodland and hedgerows.

The South Downs Local Plan Habitats Regulations Assessment assesses the potential for any significant impacts resulting from policies of the Local Plan on sites of International Nature Conservation Importance.

Baseline Information

Current evidence base

- Nature Conservation designations
- Biodiversity Opportunity Areas (Adur to Newtimer including Mill Hill)
- South Downs Local Plan Habitats Regulation Assessment Report

There are no sites of International Nature Conservation Importance within or adjacent to the AAP area. The site does not fall within any SAC / SPA buffer zones. Key wildlife habitats within the South Downs National Park include chalk grassland (4%), lowland heath (1%), woodland (20% - approximately half of which is ancient woodland), farmland habitats (85%), floodplain grazing marsh (1.5%), rivers and streams (321km of main river), and coastal and marine habitats (including 20km of coastline).

The Shoreham Cement Works sites lies to the west of the River Adur which is then bordered by areas of improved grassland. Surrounding much of the site is arable land (shown in orange, Figure 2); however, there are areas of chalk grassland, the quarry itself with its areas of exposed rock face, and some pockets of mixed woodland.

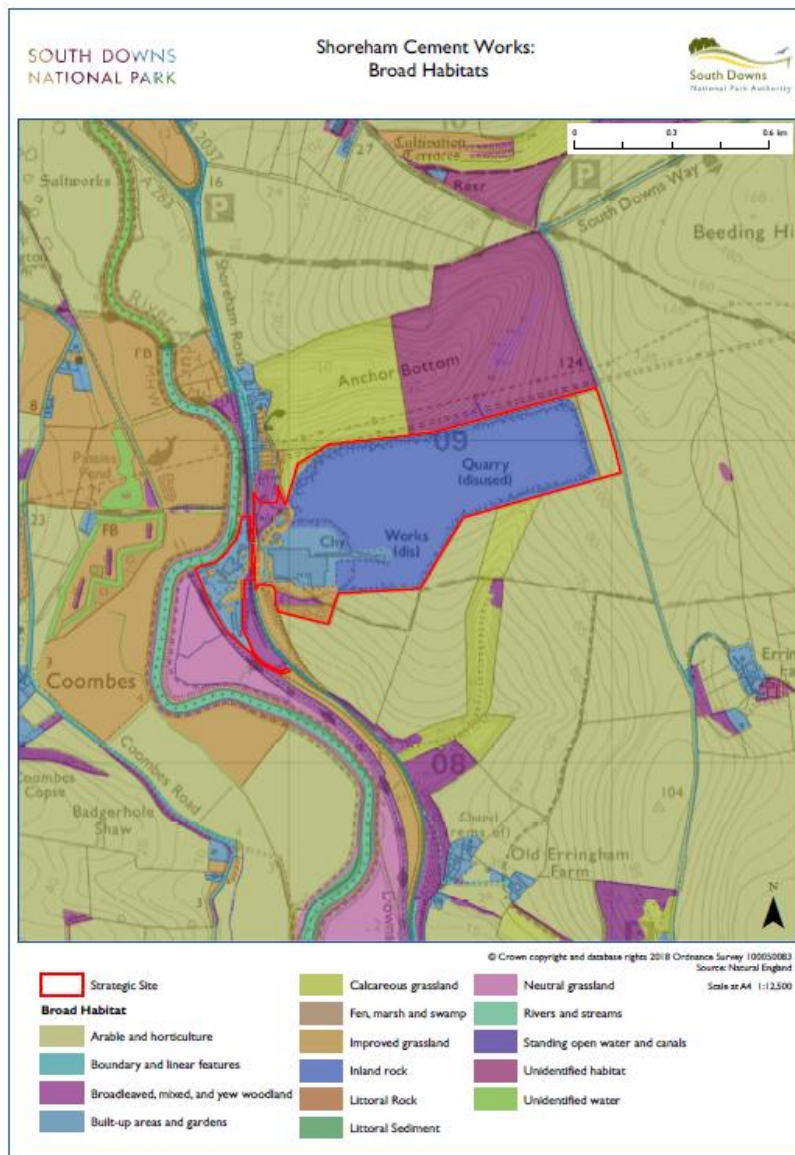


Figure 2 Broad Habitats

Intensive agriculture across the National Park has had a devastating impact on many farmland species. For example, populations of grey partridge and tree sparrow have plummeted by 94% over the past 40 years, and 97% of the flower-rich meadows have disappeared since the 1930s. However 93,561 hectares of land, or 57%, of the National Park is managed through agri-environment schemes seeking to address these declines. The future direction of Brexit, in particular the rearing of sheep, could have major implications for the landscape and biodiversity of the National Park. Farm clusters operate in the National Park, one of which covers the farms in the Arun to Adur area directly to the west of the River Adur and the Eastern Farm cluster that starts are the River Adur and takes in farms to the east. These clusters are groups of farmers, land managers, foresters and other local partners who join together to secure funding and benefit the environment in ways that they wouldn't be able to achieve alone.

In total there are 86 Sites of Special Scientific Interest (SSSIs) in the National Park covering 6% of the area. Adjoining the northern boundary of the Cement Works site is Anchor Bottom (see Figure 3), the western most edge of the Beeding Hill to Newtimber Hill SSSI, designated for its lowland chalk grassland. In 2014 Natural England assessed this part of the SSSI as being in favourable condition, consisting of well managed species rich chalk grassland which had been improved by scrub management. The site contains a number of butterfly species including the Adonis and Small Blue. The Cement Works site itself has attracted a number of bird species, notable of which are Peregrine Falcons.

The site is about 1.5km upstream from the Adur Estuary SSSI, which represents a significant area of saltmarsh and intertidal mudflats.

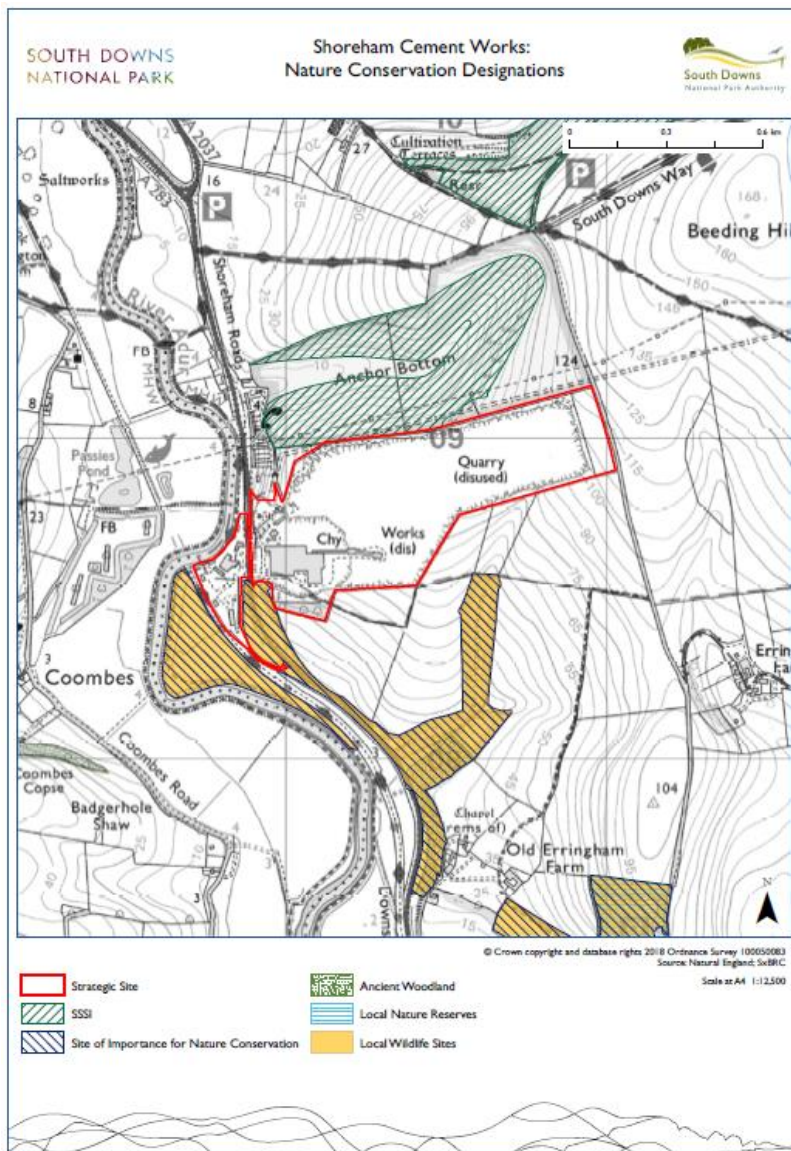


Figure 3 Nature Conservation Designations (shown in purple)

The site and adjoining land falls within the **Adur to Newtimer Biodiversity Opportunity Area (BOA)**. BOAs take a landscape-scale approach to conserving biodiversity and opportunities for improvement have been identified including chalk grassland management, restoration and creation; opportunities associated with development and farmland bird interest

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Small fragmented wildlife habitats.</p> <p>Decline in species rich chalk grassland.</p> <p>Disturbance to habitats and species now established in the disused quarry.</p> <p>Uncertainty over long-term, sustainable land management.</p>	<p>Biodiversity in the National Park is already heavily protected through National and Local Plan policy. This will continue and without the plan species will flourish or decline in line with local trends and in response to relevant land management.</p> <p>There will be no significant change in the conditions of adjoining or nearby Nature Conservation Sites but opportunities to conserve and enhance the habitats within the cement works site may not be progressed.</p> <p>There is a large level of uncertainty about the future of agriculture due to Brexit, but indications are that funding will have a greater emphasis on environmental enhancements.</p> <p>Increased visitor pressure may lead to disturbance and damage to flora and fauna.</p>

What other evidence will we be collecting – The AAP will be supported by an Extended Phase I Habitat Survey and Protected Species Assessment, work on which commenced in May 2018.

Archaeological and cultural heritage

The emerging South Downs Local Plan originally called this theme Cultural Heritage and separately also considered Cultural Activity. For this AAP they have been merged and renamed.

Policy Context

At a national level the NPPF:

- recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance, taking account of the wider social, cultural, economic and environmental benefits of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- States that a positive strategy for the conservation and enjoyment of the historic environment is required, including those heritage assets that are most at risk.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to archaeological and cultural heritage:

- SD12: Historic Environment
- SD16: Archaeology

The purpose of the policies is to set out a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets.

Baseline Information

Current evidence base

- Historic Environment Data

The SDNP has a rich cultural heritage and historic environment. This includes 152 Grade I, 221 Grade II* and 4798 Grade II Listed Building entries, 616 Scheduled Ancient Monuments, 154 Conservation Areas, 30 Registered Parks and Gardens and 2 Registered Battlefields.

The Cement Works site area does not contain any Listed Buildings, World Heritage Sites, scheduled monuments or historic parks and gardens. However, there are a variety of historical features of interest located within or adjacent to the boundaries.

Most notably the site contains a cluster of large and small industrial buildings dating predominantly from the 1940's through to the late 1960's, most prominent of which is the tall cement building tower and drying kilns. The site has an industrial history, important in the context of the South Downs. There are also a couple of limekiln locations and some evidence of early human presence in the area with human and animal bones found on the northern edge of the site

Adjacent to the site, on the opposite of the River Adur, is the deserted early medieval settlement and saltworkings of St Botolphs. This was formerly likely to be busy river crossing point. Some parts of the Grade I St Botolphs Church may be over 1000 years old.

Finally, earthworks and cropmark remains are still visible at Anchor Bottom being a relic of traditional landuse.

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Damage to archaeological features on and adjoining site by redevelopment / visitor damage.</p> <p>Loss of industrial heritage through redevelopment.</p> <p>Climate change affecting the built environment.</p> <p>Lack of opportunity to access and understand the built environment.</p>	<p>Some deterioration in the condition of key heritage assets on the site.</p> <p>The Shoreham Cement Works site will remain in its current use or be developed in a manner resulting in reduced opportunities to enhance and safeguard the heritage and cultural assets.</p> <p>No opportunities for understanding and enjoying the heritage of the site.</p> <p>No change of conditions on adjoining sites.</p>

What other evidence will we be collecting – Historic Buildings

Assessment containing an analysis of the historic and cultural assets of the site and its context, including key features to be retained and conserved, and opportunities for enhancement and interpretation. The AAP will be supported by an assessment of the historic context of the site and the role it has playing in industrial heritage

Climate change including flooding

The South Downs Local Plan originally called this theme climatic factors and separately also considered Climate change mitigation and energy – for this AAP, they have been merged and renamed.

Policy Context

At the national level, the NPPF:

- Sets out the key role for planning in securing reductions in greenhouse gas (GHG) emissions. Including supporting new development in locations and ways which reduce GHG emissions; supports energy efficiency improvements to existing buildings; positively promotes renewable energy technologies and encourages transport solutions that support reductions in GHG emissions and reduce congestion.
- Steer new development away from areas of flood risk now and in the future, as far as possible.
- Takes a proactive approach to adaptation and managing risks including well planned green infrastructure.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to climate change and flooding:

- SD2: Ecosystem Services
- SD48: Climate Change and the Sustainable Use of resources
- SD49: Flood Risk Management
- SD51: Renewable Energy

Their purpose is to embed a holistic approach to managing natural resources into the Local Plan, encourage high standards of sustainable building design and reduce vulnerability to flood risk and the impacts of flooding.

Baseline Information

Current evidence base

- Strategic Flood Risk Assessment - Level 1 and Level 2 (2015 and 2017)
- Renewable and Low Carbon Energy Study (2013)

UK air temperatures continue to rise with the strongest average monthly temperature increases being in the south east along with the Midlands and East Anglia. The analysis suggests that the south east will experience hotter, drier summers and warmer wetter winters with more extreme weather events. Sea level rise is also a factor to be considered given the location of the site on a tidal part of the River Adur.

In terms of mitigation, generation of electricity from renewable sources is increasing in the South East. The Rampion Offshore Wind Farm Project visible from the Adur Valley will have an installed generating capacity of 665 MW and will make a further significant contribution towards renewable electricity generation in the south east.

Flood risk mapping (Figure 4) shows that the site itself might be susceptible to groundwater and surface water flooding in places. The River Adur to the west has flood defences along its length but there is also a large flood zone associated with it.

The buildings on site, being made predominantly of concrete contain significant amounts of embodied energy and therefore their re-use could result in a lower levels of carbon release than their demolition and redevelopment.

The impacts of both solar glare and radiation experienced within the quarry site could be considerable during hot and sunny weather given the steepness of the cliff faces, the exposed chalk and limited shading.

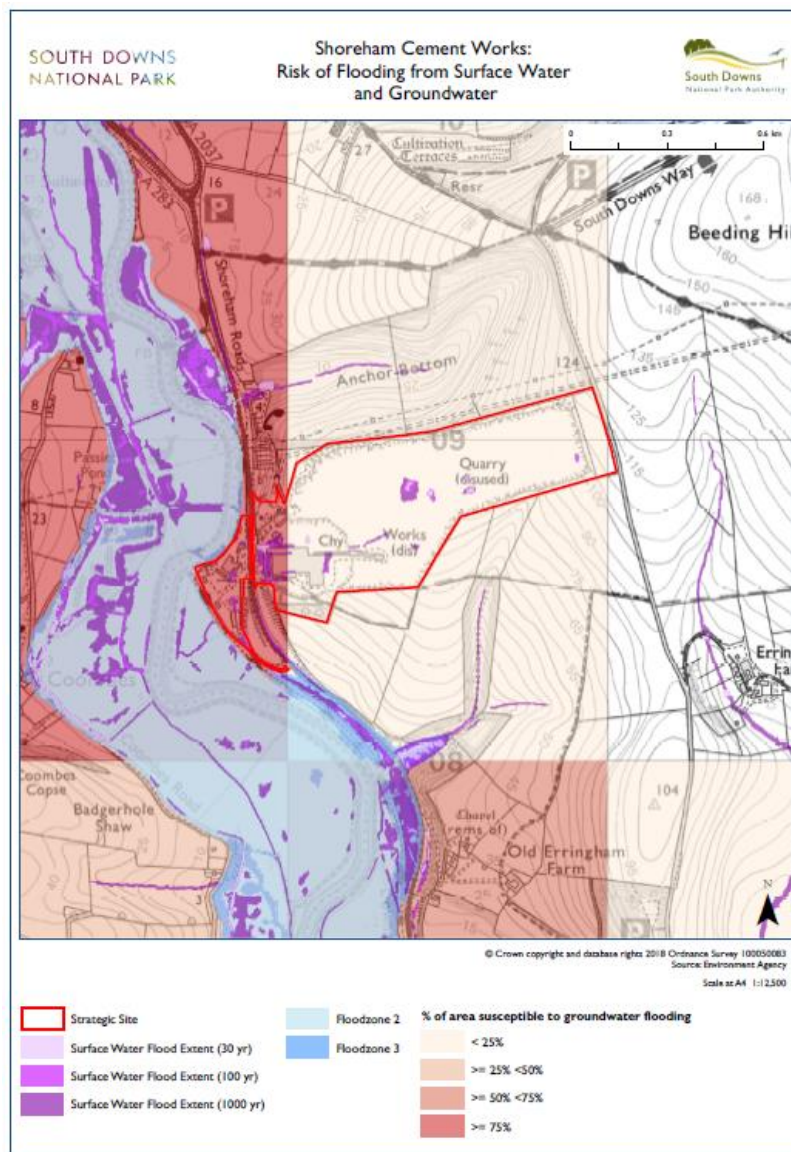


Figure 4: Flood Risk

Of relevance to this site, the **low Carbon and renewable Energy study** identified a potential for the development of biomass / woodfuel market including support for uptake of woodfuel heating with new developments.

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Increase in extreme rainfall events and flooding.</p> <p>Sea level rises increasing risk of flooding on adjacent land.</p> <p>Increased soil erosion and loss of soil condition caused by cycles of drought and extreme rainfall.</p> <p>Maintenance of clean water supply in face of increasing demand given dryer summers.</p> <p>Increased opportunities to develop low carbon and renewable energy.</p> <p>Large amounts of existing embodied energy in the site buildings.</p>	<p>The Shoreham Cement Works site will remain in its current use or be developed in a manner resulting in reduced opportunities to introduce energy generation or efficiency measures.</p> <p>The condition of large numbers of existing buildings on site will deteriorate and the embodied energy will be lost requiring further extraction, processing and manufacturing of new materials on site.</p> <p>Continuation of more extreme weather events leading to flooding, soil erosion, periods of drought, supply / demand deficit in water supply.</p> <p>Sea level rise.</p> <p>Green House Gas emissions generated from the area may decrease with ongoing energy efficiency improvements.</p>

<p>Introduction of new species into the environment.</p> <p>Increasing hostility of the chalk quarry environment with hotter drier summers.</p>	
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What other evidence will we be collecting: - The AAP will be supported by a Flood risk and Sustainable Drainage Systems study is being undertaken including updated modelling of fluvial and tidal flood risk, assessment of suitability for SuDS and establishing groundwater levels. Work commenced in May 2018. Much of the evidence being collected under the theme of water, air, soil and geology is also relevant to this section.

Health and Wellbeing

Policy Context

At the national level, the NPPF:

- States that planning policies should aim to achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other and provide safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.
- Paragraph 96 highlights that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

At the local level, there are multiples strategies and policies that can be linked to this broad theme of health and wellbeing, however, the following policies within the emerging South Downs Local Plan most directly relate to the topic:

- SD46: Provision and protection of open space, sport and recreational facilities and burial grounds / cemeteries
- SD20: Walking, Cycling and Pedestrian Routes;
- SD21: Public Realm, Highway Design and Public Art;
- SD43: New and Existing Community Facilities;
- SD47: Local Green Spaces.

The purpose of the policies is to set out how development proposals will be expected to deliver infrastructure as well as the provision or protection of community facilities.

Baseline Information

Current evidence base

- Census data 2011
- Adur Local Plan 1996 (saved policies)
- Horsham District Core Strategy 2007
- South Downs Accessible Natural Greenspace Study
- Public Rights of Way network maps,

The population of the South Downs is predominantly rural with an average population density of 70 people per square kilometre compared to a south east average of 440 people per square kilometre.

Those aged 65 and over, account for around 21 per cent of the National Park compared to 17 per cent in the South East region. The population is also ageing further with the largest increase in population being recorded for those aged 60-64. The largest decrease was recorded in those aged 30-34 years.

The dispersed nature of settlements and facilities is highly characteristic of the area but combined with limited public transport infrastructure places a high dependence upon cars and can leave people isolated. However the Cement Works site is located almost equidistant from the Upper Beeding / Steyning with a range of local services and Shoreham to the south with a much fuller range including a large out of town Retail Park.

Conversely Adur is one of the most deprived local authority areas in West Sussex. GCSE attainment has improved; however, just over a quarter of the adult population (16+) have no qualifications, the highest level for any local authority area in West Sussex. It also has the 2nd highest unemployment rate in the County and in certain areas 1 in 10 properties are in fuel poverty.

The number of adults defining their health as 'bad or very bad' is significantly worse than the English average. Obesity, smoking, low physical activity levels, diabetes, cancer, limiting long term illness, self-harm and high number of carers are key issues.

Buckingham Ward within Adur District covers parts of the site. It has a low population density and more closely reflects the characteristics of the Horsham wards to the north. It is the least deprived in Adur with high educational achievements and low levels of unemployment & benefit claimants. It has the lowest levels of crime in Adur.

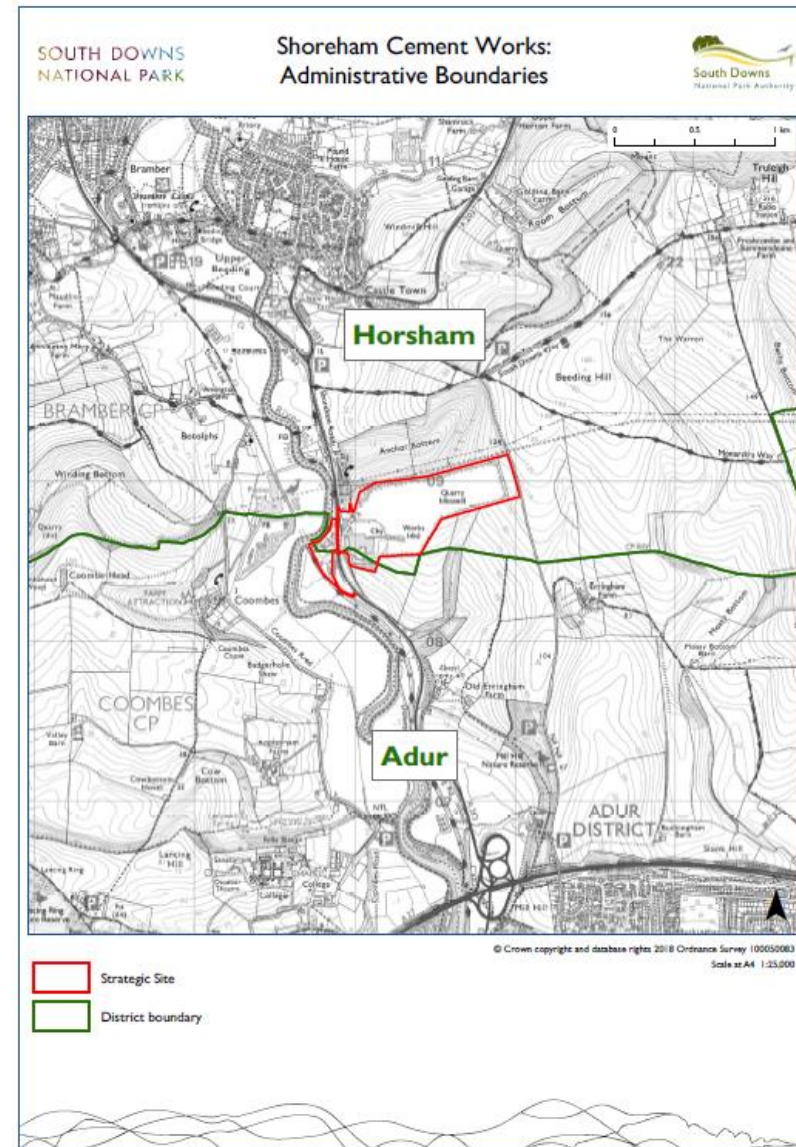


Figure 5: Administrative Boundary

Inequalities also exist in terms of physical access to the countryside. The South Downs Accessible Natural Greenspace guide identifies that there is a stark contrast between the rural, sparsely populated area of National Park and the rest of the Adur and Worthing Authority areas that are densely populated and urban. The provision of accessible natural greenspace (ANG) in the towns is negligible with only 8% having access to sites within 300m, and large areas having no access to any ANG sites. The residents of the urban areas have to rely on ANG in adjacent areas and notably in the National Park.

In summary, the site is located in an affluent area, experiencing limited deprivation. However large communities to the south are starkly different in their profile, levels of deprivation and access to natural green space.

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Population structure of the SDNP increasingly dominated those aged 65 and over.</p> <p>Limited access to public transport in places.</p> <p>Inequalities exist in terms of physical access to the countryside between different parts of the local population.</p> <p>Inequalities exist in educational attainment</p>	<p>The influence of other plans and projects in the area will be the most influential factors e.g. community strategies and health strategies of other authorities.</p> <p>Opportunities to provide publically accessible greenspace and introduce project on the site to improve health may not be realised.</p> <p>Opportunities to provide greater and more varied employment opportunities may not be realised (see Economy and Employment topic).</p>

<p>leading to lack of opportunity and social exclusion.</p> <p>Pockets of population with poor health and high care needs contrasts starkly with more affluent areas.</p>	
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What other evidence will we be collecting – consultation responses and input from local representatives will form a large part of the AAP formulation process as will input from the Upper Beeding Neighbourhood Plan group as they progress with their work on the wider parish.

Economy and employment

The emerging South Downs Local Plan originally called this topic 'Rural Economy'. For this AAP it has been broadened out to include a wider range of issues than just the rural economy, reflecting the sites location.

Policy Context

At the national level the NPPF:

- Identifies the economy as one of the three dimensions to sustainable development .
- Requires planning authorities to plan proactively to meet the development needs of business.

Regionally the Coast to Capital Local Enterprise Partnership (LEP) is a business-led collaboration between private, public and education sectors. At a strategic level the focus is on tackling issues facing the regional economy, including transport infrastructure, the development of skills and housing and securing large amounts of public investment.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to employment:

- SD34: Sustaining the Local Economy
- SD35: Employment Land

The purpose of the policies is to promote and protect local businesses without compromising the purposes of the National Park.

The Adur and Worthing Economic Strategy 2018 – 2023 seeks to develop the industrial areas in Adur to take advantage of the areas manufacturing strengths, to drive growth and productivity, increase exporting and stimulate innovation through applied technologies. In addition it seeks to enable economic growth by increasing the uptake,

quality and application of skills, particularly STEM skills at intermediate and higher levels. This is an ambition also reflected in the Horsham District Economic Strategy.

The Horsham District Economic Strategy 2017 – 2027 identifies five priority areas, the most relevant of which to this AAP are that the District offers a range of quality commercial floorspace to ensure that businesses have the opportunity to grow and remain here. The rural economy is growing with specialist industries such as fresh produce, food production and viticulture. It is also a priority to support the market town businesses and enhance the vitality of their high streets.

Finally the strategy highlights the importance of celebrating and promoting the distinctiveness of the area, building on current strengths and ensuring a secure and vibrant visitor economy.

Baseline Information

Current evidence base

Employment Land Review (2015)

Housing and Economic Development Needs Assessment (2017)

Economic Profile of the South Downs National Park (2018)

The SDNP has seen healthy growth in its business population of over 20% in the last five years to over 8,000 businesses, outperforming the South East regional growth. The two largest sectors in the National Park are the Professional, Scientific & Technical sector which makes up nearly 21% of businesses, followed by Construction with nearly 11% of businesses. Agriculture, Forestry & Fishing is the third largest sector accounting for nearly 9% of businesses.

The National Park has a high concentration of Arts, Leisure & Entertainment businesses and the visitor economy makes up over 10% of

the National Park's businesses or 835 businesses in 2017, an increase of 105 businesses or 14% since 2013.

Manufacturing is an important sector in many rural areas and the South Downs National Park is no exception; manufacturing production makes up 5% of the business base and over 8% when engineering activities are included. Together, manufacturing and engineering account for over 5,000 jobs. Only about a quarter of manufacturing could be said to be "advanced".

Business creation and survival rates are generally good in the National Park, although lower than in the comparator geographies. Over 98% of its businesses are in the micro and small category and there are fewer medium and large businesses than all the comparator geographies. In terms of turnover, there are more businesses in the National Park in the critical £0.5m to £1m bracket indicating that, although small, they are not necessarily unproductive.

A balance needs to be struck between not encouraging environmentally deleterious economic growth and supporting local communities that require well paid employment if they are to afford to live in the area.

The GVA per capita of the South Downs National Park is broadly similar to the South East and well above many parts of the UK. The unemployment rate is well below the national average. The average rural house price is over £400,000, whilst in the towns it is over £270,000. There are, therefore high levels of both in and out commuting for work.



Adur is home to several major companies including Ricardo, Dudman Aggregates, Infinity Foods and Higgidy Pies all located close to the Cement Works site. Shoreham port to the south handles over 2m tonnes of cargo per year as well as providing a range of services to commercial and leisure marine industries. Shoreham Airport, also known as Brighton City Airport, is a popular business location providing easy access to the A27 and a range of aviation and non-aviation businesses are located there. (Economic Profile of Adur: July 2017)

The Adur manufacturing sector is larger than average but is not highly productive and many small and medium enterprises (SMEs) operate in low tech markets. Advanced, high value manufacturing and engineering is underdeveloped although there are some leading edge and global companies.

There are a number of business parks that require upgrading and reconfiguration to make best use of space. Shoreham airport, in particular, lacks good quality high tech accommodation, although there is scope for expansion and re-use of space.

The workforce skills levels in Adur District are too low, particularly at degree level and above and also at intermediate and technical level. There are signs of a low wage low skills economy in some areas and sectors in the District. Adur is one of the most deprived local authority areas in West Sussex and has the 2nd highest unemployment rate in the County.

There is a good Further Education provision in the area and access to universities nearby, but both Districts experience higher value businesses skills shortages, particularly in science, technology, engineering and maths subjects (STEM subjects).

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Economy disconnected from the local area, significant levels of out-commuting.</p> <p>Uncertainty around future of agriculture.</p> <p>Disparity in income levels and employment opportunities.</p> <p>Skills shortage in STEM subjects.</p>	<p>There are a range of projects in the Adur area, these will continue without the progression of the plan.</p> <p>The site is home to a range of businesses which can continue on site.</p> <p>Opportunities to support the local economy, qualification and skill levels of local residents may not be maximised.</p> <p>Promoting the South Downs National Park on the regional / national stage will continue.</p>

Need to support the growth of small / medium enterprises which form the basis of the local economy.	
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What other evidence will we be collecting – consultation responses and input from local, District and County representatives will form a large part of the AAP formulation process.

Communities and Housing

The South Downs Local Plan originally called this topic 'Housing'. For this AAP it has been broadened out to include a range of matters relating to the community as a whole.

Policy Context

At the national level the NPPF:

- Sets a strategy to significantly boost housing supply. For the most part, this is focused on meeting the objectively assessed housing needs for the area. However it also makes very clear that where specific policies indicate development should be restricted, then this requirement to meet the full need does not apply (footnote 6 to paragraph 11, which specifies that National Parks are one such area).
- Expects local authorities to deliver a wide choice of high quality homes. They should also plan for a mix of housing based on current and future demographic trends, market trends, and the needs of different groups in the community, and set policies for meeting affordable housing needs which should generally be on-site.
- States that planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

The Government recognises that National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. Consistent with government policy, the expectation is that new housing in the SDNP will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to communities and housing:

- SD25: Development Strategy
- SD26: Supply of homes
- SD27: Mix of homes
- SD28: Affordable homes
- SD38: Shops outside centres
- SD42: Infrastructure
- SD43: New and Existing Community Facilities

The purpose of the policies is to identify towns and villages that are able to accommodate growth, establish the levels of housing expected to be delivered in each one, delivery of affordable housing and the provision of smaller homes. In addition, they ensure that development takes place alongside the protection and provision of infrastructure.

Baseline Information

Current evidence base

Authority Monitoring Report

South Downs Strategic Housing Market Assessment (SHMA) - 2015
Housing and Economic Development Needs Assessment (HEDNA) – 2017

Whole Plan and Affordable Housing Viability Report, 2017

Upper Beeding Neighbourhood Plan

Steyning Neighbourhood Plan

In 2014 there were estimated to be approximately 48,530 households in the National Park. The National Park has a high proportion of detached homes (40 per cent of all homes) with semi-detached homes accounting for a further 27 per cent of homes.

Through the Local Plan the SDNPA is making provision for approximately 4,750 additional homes in the period to 2033. The HEDNA and SHMA identify a need for a mix of dwelling sizes with a much greater level of need for small and medium-sized homes and limited need for larger houses of 4 or more bedrooms.

The affordability of housing is a major barrier to sustainable communities in the National Park. In 2016, the average house prices was 13.6 times average earnings and house prices increased by 45% from 2006 to 2016. 294 affordable homes are needed a year in the National Park to meet the full objectively assessed need for affordable housing.

The Cement Works site is located almost equidistant between Upper Beeding and Shoreham. To the west of Upper Beeding is the historic town of Steyning. Steyning is identified as a small town in the Horsham District Planning Framework and can support some development. Horsham is ranked as the second least deprived Authority in West Sussex. The areas in and around the site are some of the least deprived in the District.

The Horsham District Council Settlement Sustainability Review 2014 states that Upper Beeding has limited employment opportunities within the village although there are some nearby industrial estates. There are strong employment links with the south coast towns of Brighton and Worthing which are the main employment destinations for residents in the village. Upper Beeding has a good range of community facilities including a primary school, village hall (shared with Bramber), recreation ground, sports hall and church halls, allotments and a branch surgery of Steyning Health Centre. There is also a range of local shops including a convenience store, hairdressers as well as some more specialist outlets. Other services and facilities include a wider range of retail outlets, a leisure centre with swimming pool and a secondary school – all located in nearby Steyning – there is a ½ hourly to hourly bus service to Steyning. Upper Beeding is located within a high quality environment adjoining the South Downs National Park.

Nearby Shoreham has a population of over 20,000 people and is possibly best known for its Airport which lies to the west of the main town. The town is served by Shoreham-by-Sea railway station, located on the West Coastway Line and a range of local bus services principally running along the coastal routes. The town itself contains a moderately sized High Street containing a mix of multi-nationals as well as independent stores. It is also the location of the Ropetackle Arts Centre. The out of town Retail Park at Holmbush is home to a large Tesco, Marks & Spenser as well as a Next. There are significant areas of employment, in particular centred on the Harbour area, which provides in the region of 1,400 jobs.

Summary of key sustainability issues:	Likely evolution of the area without the AAP
Need for more affordable housing.	Continuing need for housing at affordable prices main remain.
Low capacity for settlements to accommodate new housing.	Significant shortfall in housing supply may remain an issue.
Need to ensure locations for new housing are not unsustainable, providing the opportunity to use local services.	Opportunities to provide community facilities which would enhance those in the local area, particularly to the south may not be realised.
High value area causes houses to be enlarged, improved, replaced, reducing proportion of smaller, cheaper houses.	

Need to sustain services and facilities in rural areas.	
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What other evidence will we be collecting – The identification of land for housing as part of the AAP will be very closely linked to viability. Assessments of the viability of various options will be undertaken as the AAP progresses and the input from the community on their current and likely future needs and aspirations will form a large part of the work.

Transport and travel

Policy Context

At the national level, the NPPF:

- States that local plans should support a pattern of development which, when reasonable to do so, facilitates the use of sustainable modes of transport (paragraph 30) and a balance of land uses which encourages people to minimise journey lengths (paragraph 37). It requires local planning authorities to work with neighbouring authorities and transport providers to develop strategies for infrastructure provision.
- Contains guidance on the design of developments and on local parking standards. Paragraph 35 sets out transport issues to be addressed in the selection and design of new development sites. Paragraph 75 states that planning authorities should seek opportunities to add links to existing rights of way networks, and to protect and enhance public rights of way and access.

At the local level, the following policies within the emerging South Downs Local Plan directly relate to transport and travel:

- Policy SD19: Transport and Accessibility
- Policy SD20: Walking, Cycling and Equestrian Routes
- Policy SD21: Public Realm, Highway Design and Public Art
- Policy SD22: Parking Provision

Alongside Policy SD25: Development Strategy, the purpose of the policies is to direct development towards the most sustainable locations in transport terms, safeguard and enhance non-motorised routes and provide guidance on design and parking.

The National Park overlaps with four Local Transport Authority areas- Hampshire, West Sussex, Brighton & Hove and East Sussex- each with their own Local Transport Plan. All the Local Transport Authorities have

also produced lower-level planning documents setting out their investment priorities in more detail. They have also produced Rights of Way Improvement Plans (ROWIPs) which have informed the emerging South Downs Local Plan.

The document 'Roads in the South Downs' (2015) was commissioned by the SDNPA in close collaboration with the local highway authorities. It contains guidance on locally appropriate highway design for the area. It combines an approach based on careful analysis of appropriate design speeds for traffic with an emphasis on distinctive place-making, village entrances and an integration of roads and streetscapes with their surrounding buildings, features and landscape elements.

Baseline Information

Current evidence base

South Downs Transport Study Phase I (2013)
Local Plan Transport Assessment (2016)
WSCC, 2016. West Sussex Walking and Cycling Strategy 2016 - 2026
WSCC, Breathing Better: A Partnership Approach to Improving Air Quality in West Sussex (2018)
West Sussex Rights of Way Improvement Plan
Roads in the South Downs (2015)

All of which incorporate key messages from County Transport plans.

Residents, business and visitors to the National Park have a high dependence on cars. This increasing dependence is a reflection of poor public transport infrastructure and the dispersed, rural nature of the communities.

Approximately 22,500 residents living in the SDNP commute out to other destinations in the south east, including London. Peak capacity on rail commuter routes between London and south coast termini such as

Brighton, Portsmouth and Southampton is an acknowledged problem. Similar capacity issues are affecting coastway services primarily driven by housing development and associated population increases.

The site is well connected to the strategic road network with links to Gatwick and London as well as the business areas in Shoreham Harbour and Shoreham Airport. A significant proportion of residents commute out of the Adur District to work and the District contains 4 railway stations, the closest to the site being in Shoreham.

Buses travel along the A283 and destinations include Steyning, Shoreham and Brighton. In addition there are significant numbers of footpaths and high quality cycle ways including the Downs Link and Monarchs Way Long Distance Footpath adjoining or in close proximity to the site (Figure 6) which provide connections to Steyning, Shoreham and other coastal towns.

The SDNP is transacted by a number of strategic highway routes. The Shoreham Cement works site sits just to the north of the A27 (east – west route) on the A283. Pressures for road improvements exist throughout and adjoining the South Downs.

Key strategic development sites to the south of the Cement Works around Shoreham and Lancing will require works on the A27 to mitigate the impact.

To the north some key local routes transect the National Park. An increase in their usage damages tranquillity.

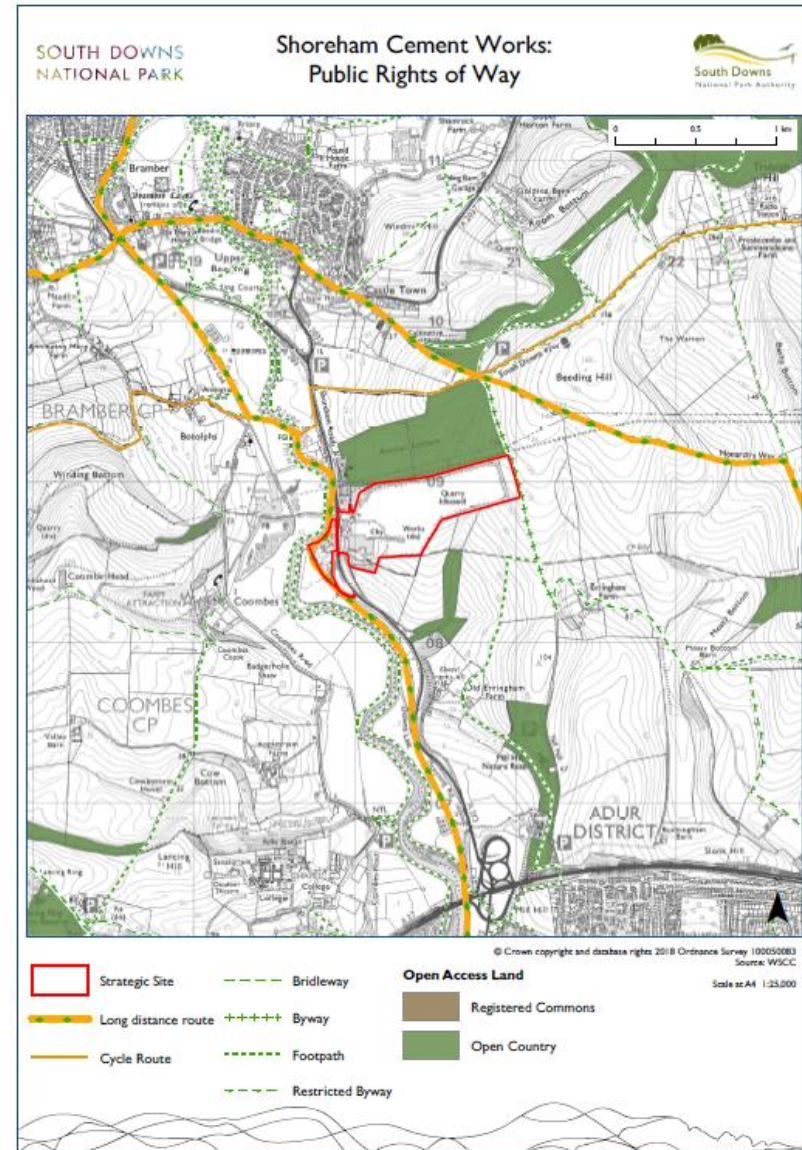


Figure 6: Footpaths and cycle routes

Summary of key sustainability issues:	Likely evolution of the area without the AAP
<p>Peak time road congestion leading to delay, poor traveller experience and reduction in air quality.</p> <p>Key transport routes transect the SDNP.</p> <p>High visitor dependence upon cars.</p> <p>Some rail commuter routes will be at peak capacity by 2020.</p> <p>Large scale development outside the SDNP leading to increasing levels of traffic through the National Park.</p> <p>Opportunities to connect to excellent network of public footpaths and cycle routes.</p> <p>Opportunities to maximise bus use by connecting through to existing networks.</p>	<p>Congestion leads to poor air quality, travel delays – effects economy and visitor experience as well as residents.</p> <p>Significant development proposals in the local area outside of the National Park may lead to large increases in traffic whether or not development takes place on this site. Significant mitigation will be needed.</p> <p>Public transport and resolving congestion hot spots would remain a key objective.</p> <p>Opportunities to encourage walking and cycling (also good for health and wellbeing) may not be optimised.</p> <p>Opportunities to utilise existing public transport may not be optimised.</p>

What other evidence will we be collecting – Transport modelling of various development options will be undertaken once they have been refined and once more certainty exists over proposed development beyond the National Park boundary to the south.

Site specific highways and access assessments will also be required.

Water, air, soil & geology

Policy Context

At the national level the NPPF:

- States that planning policies should comply with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management.
- Paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by protecting geological conservation interests and soil.

At the local level, the following policies within the South Downs Local Plan directly relate to this water, air, soil and geology:

- SD17: Protection of the Water Environment
- SD9: Biodiversity and Geodiversity
- SD54: Pollution and Air Quality
- SD55: Contaminated Land

The purpose of the policies is to protect groundwater and surface water assets, set out a positive strategy for the conservation and enhancement of geodiversity and manage the impact of pollutants.

Horsham and Adur District Councils are required to monitor air quality across the authority areas and take action where nationally set levels are likely to be exceeded. The EU Water Framework Directive requires action to be taken to prevent deterioration of aquatic ecosystems and protect, enhance and restore water bodies to 'good' status.

Baseline Information

Current evidence base

Water Cycle Study and SFRA Level I (2015)

Soils Data Cranfield University

Sussex Geodiversity Partnership – Regionally Important Geological and Geomorphological sites entry

WSCC, Breathing Better: A Partnership Approach to Improving Air Quality in West Sussex (2018)

Adur Air Quality Action Plan (2007)

Adur Annual Status Report 2017 (2017)

Southern Water – Water Resources Plan 2015 - 40

The chalk of the South Downs, being very porous, acts as a huge sponge (or aquifer) and stores water. It is this groundwater that supplies the large majority of the people living within and around the South Downs with their drinking water, constituting ~75% supply. The site is not located within a designated Groundwater Source Protection Zone but there are a number of strategic boreholes in adjoining areas and a principal aquifer lies below the site. In addition the groundwater body itself is classified under the Water Framework Directive as failing.

Pressure from new development and rising household demand is increasing the need for water across the southeast. This is having an impact on the water resources from the South Downs National Park. The level of abstraction, from both the Chalk and Lower Greensand aquifers across the National Park, already exceed the available natural resource (Environment Agency, 2012). This also has an effect on river flows and the need to maintain their ecological condition. Adur District is classified by the EA as an area of serious water stress. Equally there are similar pressures on waste water disposal so there are multiple reasons to ensure high standards of water efficiency and grey water re-use.

Water companies produce water resources management plans every 5 years which set out how they will manage such increasing demands and maintain supplies over a 25 year horizon.

The River Adur is classified as a 'transitional water body' of moderate quality. The aim as a minimum is for no deterioration in that quality. There is the potential for hydraulic connectivity between the site and nearby river.

There are no air quality management zones in or in close proximity to the site.

The soil (where it exists) over and adjoining the site is described as shallow lime-rich over chalk or limestone with a loamy texture. Much of the site is identified as a Local Geological site, identified for its lower / middle and upper chalk geology. The full entry is in Appendix 3. The river to the west is underlay by clay, silt and sand.

Summary of key sustainability issues:	Likely evolution of the area without the AAP
Water demand exceeds supply with resulting over abstraction from aquifers / rivers affecting quality of water sources.	No deterioration in quality of water in River Adur.
Groundwater supplies large majority of people living in and around the South Downs.	All opportunities to appreciate / explore / understand chalk geology may not be realised.
Air quality to be maintained or improved.	Reduction in air quality in areas of high congestion. Improvement in air quality at a more regional level due to policy at National Government levels.
	Continued pressure to extract groundwater.

Water quality of River Adur to be maintained or improved.	Damage to thin and fragile soil on the site may occur.
Lack of opportunity to access and appreciate the chalk geology of the South Downs.	
Degradation of soil quality through trampling, erosion and climate change.	

What other evidence will we be collecting – ground contamination and water quality assessment which will identify contamination sources and potential development constraints. Geotechnical assessment will be undertaken to assess stability of quarry rock faces, presence of karstic features, water table heights and historic uses that may influence options. Finally a further assessment will look at the geological value of the cliff faces and chalk screes and determine whether any should be preserved for their scientific and educational value.

5. Stage A4 – The Sustainability Appraisal Framework

The SA for the South Downs Local Plan lists 12 sustainability objectives. Since the emerging Local Plan fully encompasses the extent of the AAP it provides a starting point in identifying sustainability objectives that are relevant to the development of this plan. These objectives have then been reviewed in light of the key sustainability issues emerging from the preceding collection of baseline data (Stages A2 and A3) and their relevance to the AAP. A number have consequently been excluded or adapted.

Furthermore it is considered to be consistent with the guidance on evidence provided by the NPPF, namely that:

Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.

The following table links thematic topics of the SEA Directive with the SA objectives of the emerging South Downs Local Plan and the proposed objectives for the AAP. Some objectives could easily sit under multiple issues so a best fit has been used.

Proposed Area Action Plan Sustainability Objectives

No.	Topic	South Downs Local Plan SA objective(s)	PROPOSED Shoreham Cement Works Area Action Plan SA objective(s)	Decision aiding questions
1	Landscape SEA topic: Landscape	To conserve and enhance landscape character.	1.1 To conserve, enhance and restore the landscape of the site in accordance with the landscape strategy contained within the Shoreham Cement Works Landscape Assessment (To be produced by Autumn 2018).	<ul style="list-style-type: none"> To follow the preparation of the Shoreham Cement Works Landscape Assessment.
2	Biodiversity SEA topic: Biodiversity / Flora and Fauna	To conserve and enhance the region's biodiversity.	2.1 Conserve and enhance priority species and habitats that occur on the site as identified in the Shoreham Cement Works Extended Phase I Habitat Survey and Protected Species Assessment (To be produced by Autumn 2018).	<ul style="list-style-type: none"> Will the option contribute to the enhancement of the biodiversity opportunity area including conserving, restoring and creating chalk grassland and farmland bird species? Will the option adequately conserve and enhance protected species and habitats identified in the Extended Phase I Habitat Survey and Protected Species Assessment? Will the option result in net biodiversity gain?
3	Archaeological and cultural heritage SEA topic: Cultural heritage	<p>Conserve and enhance the historic environment, heritage assets and their settings.</p> <p>To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism</p>	<p>3.1 To conserve key features of the industrial heritage of the site, including the cement tower and others as identified in the Shoreham Cement Works Historic Buildings Assessment (to be produced Autumn 2018).</p> <p>To ensure development delivers sustainable tourism (see Economy and Employment theme).</p>	<ul style="list-style-type: none"> Will the option promote sensitive re-use of important buildings? Will current and future generations understand the history of the site in relation to chalk extraction, cement production and regeneration?

No.	Topic	South Downs Local Plan SA objective(s)	<u>PROPOSED</u> Shoreham Cement Works Area Action Plan SA objective(s)	Decision aiding questions
4	Climate change including flooding SEA topic: Climatic factors / Material Assets	To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures. To ensure the SDNP communities are prepared for the impacts of climate change.	4.1 Minimise the risk of flooding to new and existing development. 4.2 Maximise the use of low carbon and renewable energy within the site. 4.3 Minimise the impacts on health of both solar glare and radiation experienced within the quarry site. 4.4 Minimise water consumption and maximise grey water recycling to reduce pressure on local water supplies. 4.5 Makes best possible use of existing materials and resources already on the site.	<ul style="list-style-type: none"> • Will the option reduce the risk of flooding from all sources to future development? • Will the option help to reduce the rate of run-off? • Will the option encourage Sustainable Urban Drainage Schemes? • Will the option ensure that increased flooding extremes can be withstood? • Will the option reduce the need for energy use? • Will the option facilitate the generation / use of renewable energy?
5	Health and Wellbeing SEA topic: Heath / Population	To improve the health and well-being of the population and reduce inequalities in health and well-being.	5.1 To improve the health and well-being of the population and reduce inequalities in health and well-being.	<ul style="list-style-type: none"> • Will the option help to improve the health of the community? • Will the option encourage healthy lifestyles? • Will the option improve access to accessible natural green space? • Will the option help overcome social exclusion? • Will the option help address the issues of deprivation and poverty?

No.	Topic	<i>South Downs Local Plan SA objective(s)</i>	<i>PROPOSED Shoreham Cement Works Area Action Plan SA objective(s)</i>	<i>Decision aiding questions</i>
6	Economy and Employment	<p>To encourage development of the rural economy in a manner that balances agricultural and other business interests to maintain a living, valued landscape.</p> <p>To deliver sustainable tourism.</p>	<p>6.1 Development that provides for small / medium business enterprises particularly in the core sectors of food production, tourism, land management, engineering, construction and design.</p> <p>6.2 To deliver sustainable tourism which promotes a modal shift from private to public transport, diversifies and improves the tourism offer and improves the knowledge and custodianship of visitors.</p>	<ul style="list-style-type: none"> • Will the option encourage a range of jobs that are accessible to residents? • Will the option support the clusters or network of knowledge driven, creative or high technology industries? • Will the option increase the likelihood of local jobs being filled by local people? • Will the option ensure that the viability, vitality and competitiveness of nearby town and village centres are not harmed? • Will the option encourage diversity and quality of employment?

No.	Topic	<i>South Downs Local Plan SA objective(s)</i>	<i>PROPOSED Shoreham Cement Works Area Action Plan SA objective(s)</i>	<i>Decision aiding questions</i>
7	Community and Housing	<p>To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.</p> <p>To improve accessibility to all services and facilities.</p> <p>To create and sustain vibrant communities which recognise the needs and contributions of all individuals.</p>	<p>7.1 Contribute towards affordable housing.</p> <p>7.2 Ensure any housing is of a suitable size and type to meet identified local needs.</p> <p>7.3 Ensure residents have convenient and sustainable access to day-to-day local services.</p> <p>7.4 A mixed community where children can play freely and social isolation is the exception.</p> <p>7.5 Development that does not harm the viability of services and facilities in surrounding communities in particular Upper Beeding, Steyning and Shoreham.</p>	<ul style="list-style-type: none"> • Will the option significantly boost the supply of affordable housing? • Will the option promote improvements in the availability and quality of the housing stock? • Will the option negatively impact on existing local facilities?

No.	Topic	<i>South Downs Local Plan SA objective(s)</i>	<i>PROPOSED Shoreham Cement Works Area Action Plan SA objective(s)</i>	<i>Decision aiding questions</i>
8	Transport and travel	To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	<p>8.1 Provide convenient access to a range of sustainable modes of transport to and from the site.</p> <p>8.2 Minimise the impact of required highways schemes on the landscape, biodiversity, heritage and riverine environment.</p>	<ul style="list-style-type: none"> • Will the option reduce the need to travel, especially by private motorised vehicles? • Will the option help provide walking / cycling / public transport infrastructure? • Will the option be accommodated within the existing public transport constraints? • Will the option improve access to the countryside and historic environments? • Will the option improve access to key services (education, employment, recreation, health, community services, cultural assets)?

No.	Topic	South Downs Local Plan SA objective(s)	<u>PROPOSED</u> Shoreham Cement Works Area Action Plan SA objective(s)	Decision aiding questions
9	Water, air, soil and geology	-	<p>9.1 No reduction in water quality of rivers and aquifers.</p> <p>9.2 Reduce congestion or minimise unavoidable increases in congestion.</p> <p>9.3 Prevent soil erosion and compaction.</p> <p>9.4 Protect and provide access to key parts of site to enable people to appreciate the chalk geology.</p>	<ul style="list-style-type: none"> • Will the option improve water quality and maintain an adequate supply of water? • Will the option reduce pollution of groundwater, watercourses and rivers from run-off / point-sources? • Will the option provide adequate utilities infrastructure to service development to avoid unacceptable impacts on the environment? • Will the option safeguard water resources to maintain an adequate level of river and ground water? • Will current and future generations understand the history of the site in relation to chalk extraction, cement production and regeneration?

SEA topic: Soil /
Water / Air

Stage A5 – Consulting on the scope

It is a statutory requirement that the Scoping Report be sent to the three Environmental Consultation Bodies¹. In addition, to ensure the widest possible consultation takes place at this stage, relevant local stakeholders will be invited to take part as well. Consultation at this stage is fundamental to ensure that the Scope of the SA is fully identified and the subsequent report comprehensive enough.

Compliance with the SEA Directive

“The bodies identified by the UK Government as being likely to be concerned by the environmental effects of implementing the plan have been consulted in deciding” (Annex I (d)) – Article 5 (4)

Next Steps

Following the consultation, the baseline and objectives will be updated as appropriate. The objectives will then be used to test a range of reasonable alternatives. This testing will identify the sustainability merits or otherwise of a scheme now and in the future. It will also help to identify potential mitigation. The results of the testing will feed back into the AAP.

The final component of the Framework is a series of indicators that will be used to provide a basis for future monitoring. These will allow an assessment of whether or not policies are effective in addressing the sustainability objectives and will be developed later.

¹ Environment Agency, Natural England and Historic England

Appendix I: Full text of South Downs Local Plan policy SD56

Strategic Site Policy SD56: Shoreham Cement Works

1. Shoreham Cement Works, as identified on the Policies Map, is an area of significant opportunity for an exemplar sustainable mixed use development, which delivers a substantially enhanced landscape and uses that are compatible with the purposes of the National Park. To help achieve this the National Park Authority will prepare an Area Action Plan (AAP) with the overall aims of:
 - a) Enhancing the visual impact of the site from both the nearby and distant public viewpoints;
 - b) Conserving, enhancing and providing opportunities for understanding the biodiversity, geodiversity, historic significance and cultural heritage of the site;
 - c) Ensuring the delivery of Ecosystems Services; and
 - d) Ensuring that the design of any development is of the highest quality and appropriate to its setting within a National Park.
2. The National Park Authority would support development proposals for
 - a) Sustainable tourism / visitor based recreation activities and leisure development directly related to the understanding and enjoyment of the National Park;
 - b) B2 and B8 business uses to support the local economy, with a focus on environmentally sustainable activities, supporting local communities and providing opportunities for entrepreneurship; and
 - c) Further types of development that would enable the environmentally-led restoration of the site,provided that the proposals can clearly demonstrate how they would deliver the key considerations set out in Part I of this policy, and
 - d) Improves accessibility and helps to create sustainable patterns of travel;
 - e) Provides renewable energy generation to serve any development on the site;
 - f) Provides realistic proposals for the relocation of existing employment and storage uses that are not appropriate to a National Park setting; and
 - g) Ensures that any adverse impacts (either alone or in combination) are avoided, or, if unavoidable, minimised through mitigation with any residual impacts being compensated for.
3. The National Park Authority will resist more development than is necessary to secure and deliver the environmentally-led restoration of the site.
4. The National Park Authority wants to see a comprehensive redevelopment of the whole site consistent with the AAP. However, if any planning applications come forward separately and prior to the adoption of the AAP, then they would have to clearly demonstrate how the proposals would accord with the key considerations set out above.

Appendix 2: Landscape Character areas.

<p>G3: Adur Valley Sides (light blue wash)</p> <p>Characterised by:</p> <ul style="list-style-type: none"> • Valley sides carved from chalk, relatively steep along their length. • Pasture, chalk grassland and woodland occupy steeper slopes, for example at Mill Hill and Anchor Bottom. • Contains an extensive road network, including the A283 and Coombes Road. • Minor lanes and unsurfaced tracks descend the valley sides – many of these are public rights of way. • A string of shrunken medieval villages lie along the lower slopes of the western valley side e.g. Botolphs, Coombes, Applesham Farm. These are surrounded by early enclosures. • Woodlands along the lower slopes are particularly distinctive and form a strong wooded edge to the floodplain. • Away, from the roads, the valley sides form a tranquil, rural setting to the floodplain. • The chimney of the Shoreham Cement Works is a key landmark feature. 	<p>F3: Adur Floodplain (dark blue wash)</p> <p>Characterised by:</p> <ul style="list-style-type: none"> • Flat valley floor of the deep U-shaped Adur Valley between Bramber and Old Shoreham. • A landscape of apparent large and expansive scale as a result of the flat landform, consistent pasture land cover, lack of trees and other vertical elements and far-reaching views across the open floodplain. Views are contained by the valley sides. • Contains the meandering course of the tidal River Adur which flows between artificial flood banks. Public rights of way provide access along the tops of the floodbanks. • Saltern mounds provide evidence of the medieval salt-extraction industry. • Periodically waterlogged silty soils support permanent pasture, within fields reclaimed from the floodplain, giving the floodplain a lush, pastoral character and supporting an important ecological flora. • Groups of willows and alders occur sporadically alongside the river and drainage channels providing important visual and ecological features. • A small area of the Adur Estuary (designated as a SSSI) extends into the character area, supporting ecologically important saltmarsh and intertidal mudflats, of high value to wading birds. • Typically absent of settlement, with the exception of the ancient settlement edge of Beeding (a medieval port) on the northern character area boundary. • Tranquillity affected by proximity of built development on the valley sides, the A283 and A27. • Views to the landmarks of Bramber Castle and Lancing College on the adjacent valley side.
<p>A2: Adur to Ouse Open Downs - where relevant to the site and immediate environs (yellow wash)</p> <p>Characterised by:</p> <ul style="list-style-type: none"> • Vast open rolling upland chalk landscape of blunt, whale-backed Downs. • Furrowed by extensive branching dry valley systems which produce deep, narrow, rounded coombs. • Large scale irregular fields (of 20th century date) of arable and pasture bounded by visually permeable post and wire fencing or sparse thorn hedgerows creating a very open landscape supporting a range of farmland birds. Hedgerows and tracks survive from the earlier manorial downland landscape. • Significant areas of unimproved chalk grassland, which supports nationally scarce plant species. • Occasional scrub and woodland on steeper slopes adds to the overall diversity of chalk grassland habitats, contributes to biodiversity and provides visual texture in the landscape. • Large open skies ensure that weather 	

conditions are a dominant influence creating a dynamic landscape, with considerable seasonal variation.

- A strong sense of remoteness and tranquillity in close proximity to the south coast urban area.

A large number of prehistoric and later earthworks providing a strong sense of historical continuity.

- Good public access with a network of public rights of way and open access land.

Proximity to urban areas means there are a large number of potential users.

- The communication masts at Truleigh Hill are prominent features of the skyline.

Appendix 3: Shoreham Cement Works – Sussex Geodiversity Records entry

Sussex RIGS number: TQ20/101

Grid Reference: TQ202088

Summary Description:

22/09/2010

(from West Sussex RIGS Survey 2010)

Interest Feature(s)

Bedrock:

Large disused chalk quarry exposing sequence from lower Lewes Nodular Chalk to upper Seaford Chalk formations. The exposed sections of Lewes Chalk and Seaford Chalk formations are both about 50 m thick. The quarry is 1 km long and varies in width from 250-450m.

Stratigraphy:

Lower Lewes Nodular Chalk Formation (Ringmer Beds) to upper Seaford Chalk Formation (basal Haven Brow Beds), White Chalk Subgroup, late Cretaceous in age (including the Turonian-Coniacian and Coniacian-Santonian boundaries). Key marker beds exposed are the Navigation Hardgrounds and Marls, Lewes Marl and Flint Bands, Cuckmere and Seven Sisters Flint Bands, Belle Tout and Shoreham Marls.

Sedimentology:

Lewes Chalk - rhythmic sequence of soft chalks, nodular chalks and hardground chalks with thin marls and regular seams of flints; Seaford Chalk - homogeneous white chalk with regularly spaced seams of large flints. The quarry shows an excellent range of the possible sedimentological variations in the Chalk. Deposited in relatively deep marine environments.

Sedimentary structures:

Lewes Chalk - 'Augen' (eye-shaped structures) seen at base of Bridgewick Marls. Extensive burrows and trace fossils are present. Interlaced (griotte) marl seams are visible in the lowest sections. Tubular flints extend down to about 3 m below the Lewes Marl and dumbbell-shaped flints occur above it. Nodular horizons in the upper Lewes Chalk are often stained red with iron.

Palaeontology:

A wide variety of fossils have been found including zone fossils and unusual forms of some species which are important for correlation with other sites. This site has huge geodiversity of echinoids, bivalves, aragonitic fossils, brachiopods and many others.

Structural geology:

Rock fracture patterns are similar to Seaford Head. A conspicuous fault is visible on the eastern face, and inclined faults or shear planes are visible on the north and south faces. Downslope movement has developed overfold structures and gulls towards the Adur valley.

Geomorphology:

Faults and shear planes have been exploited by solution processes resulting in cavities and infilling by younger sediments.