

I Introduction

What is the Area Action Plan and what is it seeking to achieve?

- I.1 The Area Action Plan (AAP) will be the development plan for Shoreham Cement Works. It has been prepared by the South Downs National Park Authority (SDNPA), which is the local planning authority for the site. The SDNPA does not own the site, which is owned by the Dudman Group of companies. The purpose of the AAP is to guide the development of this exceptional site and help deliver an exemplar mixed use development of regional or indeed national importance.
- I.2 This is the Issues & Options version of the AAP and we are seeking the views of everyone who is interested in the site. A special website has been created for this consultation, which can be accessed on <https://www.southdowns.gov.uk/area-action-plan-shoreham-cement-works/>. On this website you can view specially filmed drone footage and you can add your thoughts and comments on the development of the site. The consultation website contains the same questions that are set out throughout this document.
- I.3 The final adopted version of the AAP will be the statutory development plan for Shoreham Cement Works along with the South Downs Local Plan¹ covering the whole National Park, the Upper Beeding Neighbourhood Plan² covering the parish of Upper Beeding and the West Sussex Joint Minerals Local Plan³ and Waste Local Plan⁴. The planning system in this country is plan-led and statute states that decisions on planning applications must be taken in accordance with the development plan unless material considerations indicate otherwise. Accordingly, this AAP will be used in the determination of planning applications for Shoreham Cement Works. The plan period for the AAP is 2014-2033, which is the same as the Local Plan.
- I.4 The AAP will specifically cover the land bounded by the red line shown on the Policies Map. However, it also needs to look beyond the site boundaries to assess the implications for development particularly in regard to landscape and transport infrastructure.

Planning in the South Downs National Park

- I.5 The AAP sets out how the National Park Authority as the local planning authority will manage development at Shoreham Cement Works up to 2033. This is based on the statutory purposes and duty for national parks as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995:

¹ South Downs Local Plan, South Downs National Park Authority, 2019

² Upper Beeding Neighbourhood Plan, Upper Beeding Parish Council, 2021

³ West Sussex Joint Minerals Local Plan, West Sussex County Council & South Downs National Park Authority, 2018

⁴ West Sussex Waste Local Plan, West Sussex County Council & South Downs National Park Authority, 2014

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

I.6 The National Park Authority also has a duty when carrying out the purposes:

- To seek to foster the economic and social well-being of the local communities within the National Park but without incurring significant expenditure in doing so, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.

I.7 In addition, Section 62 of the Environment Act 1995 requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. If there is an irreconcilable conflict between the two purposes, Purpose 1 takes precedence.

I.8 It should be noted that all areas of the National Park, both brown and green field, are given the highest level of landscape protection under paragraph 176 of the NPPF⁵. This includes Shoreham Cement Works.

I.9 A key question to ask of the redevelopment is how it could contribute to the purposes and duty of the National Park.

What is the structure of the AAP?

I.10 The Issues & Options version of the AAP is set out as follows:

- Introduction: introduces the AAP and talks about planning in a national park
- Shoreham Cement Works Now: paints a spatial portrait of the site and its surroundings today
- Re-imagining Shoreham Cement Works: sets out the vision and objectives for redevelopment, current opportunities and constraints and overarching design principles
- The Five Areas of Shoreham Cement Works: explores what makes each of the five areas special, their individual opportunities and constraints and design principles
- Issues and Options: explores the issues and options for a number of cross-cutting themes such as contaminated land and cultural heritage
- The Way Forward: talks about choosing a preferred option

I.11 This Issues & Options document does not contain any policies, which instead will feature in the Preferred Option version of the Plan.

Planning process and context

⁵ National Planning Policy Framework, DLUHC, 2021

- I.12 The planning timeline for Shoreham Cement Works is set out in Appendix I. It starts with the permission granted to extract chalk just after the end of the Second World War, sets out milestones for this AAP and looks forward to the eventual grant of planning permissions for redevelopment.

Major development in a national park

- I.13 Major development in a national park is not permitted under national policy set in the NPPF and local policy set in the South Downs Local Plan other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
- I.14 The Local Plan established that the redevelopment of Shoreham Cement Works constituted major development. The Local Plan states that the Authority's main objective for this site is to secure a significantly enhanced landscape and accepts that major development provides the best opportunity to achieve this whilst noting that any scheme has to be viable to ensure delivery.
- I.15 In order to ensure that the allocation of the site in the AAP is deliverable against the policy tests of major development set in paragraph I77 of the NPPF and Policy SD3 of the Local Plan, it is necessary to consider exceptional circumstances and public interest. Firstly, the need for the development arises from the need to deliver a substantially enhanced landscape for the site within the nationally designated landscape of the National Park. This need can obviously not be met elsewhere as it is site specific and so it meets the second test on developing outside the designated area. Thirdly, any detrimental effect on the environment, landscape and recreational opportunities will need to be carefully considered through this AAP and moderated as necessary.
- I.16 A full assessment of major development would need to be made for any application that was submitted for this site in line with paragraph I77 of the NPPF and Policy SD3 of the Local Plan. It should be noted that criterion 3 of Policy SD3 sets high sustainability standards for major development in the South Downs, which are required to be zero carbon and zero waste.

Ecosystem Services and natural capital

- I.17 Ecosystem services are the goods and services we get from nature. The redevelopment of this site will be required by the Authority to have an overall positive impact on the ability of the environment to contribute these goods and services. There are a multitude of different ecosystem services that can be broadly grouped into four categories namely cultural, regulating, supporting and provisioning services. Examples of ecosystem services currently provided by the site are the biodiversity of the open mosaic habitat covering most of the site (supporting services) and the tranquility at the far end of the quarry (cultural services).

Development scenarios

I.18 A number of potential development scenarios were prepared for the AAP. They follow on from the scenarios set out in the Sustainability Appraisal of the Local Plan. Further work was done on the landscape-led capacity of the site to finesse the development quantum. We looked at all the land uses that are allowed under the Local Plan policy including homes, business units, a hotel and leisure facilities. All the development scenarios are for a mixture of different land uses, which will all vary in viability and impact on the landscape. The detailed figures are set out in a table forming Appendix 2 of this document and the headlines for the four scenarios are as follows:

1. Mixed use scheme with employment and 400 new homes
2. Mixed use scheme with employment and 240 new homes
3. Mixed use leisure led scheme and 200 new homes
4. Mixed use scheme with employment and 84 new homes (dismissed appeal scheme)

I.19 These scenarios were systematically tested by the consultants preparing our transport and viability studies. It should be noted that no development or 'do nothing' is not a reasonable alternative for the site although it was addressed in the Sustainability Appraisal.

Sustainability Appraisal

I.20 The purpose of a Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the AAP. It is necessary for both the AAP and its accompanying SA to meet the requirements of the Strategic Environmental Assessment Directive.

I.21 An SA for the South Downs Local Plan was undertaken by AECOM⁶ and iterations of the SA supported each stage of plan preparation. As part of this work, the SA appraised the allocation of Shoreham Cement Works under Policy SD56. The SA process undertook an appraisal of a number of strategic level alternative options for the site. Four options were considered for the site through the SA process, linked to different uses for the site relating to land use classes.

I.22 The appraisal findings in relation to the four options were organised by the twelve sustainability themes. For each sustainability theme, a commentary on the likely effects was presented. Options were also ranked numerically reflecting their relative sustainability performance. Recognition was given to the significant negative visual impact the site has on the National Park and the complexity of delivering any development. Given that position, the Local Plan preferred approach was to seek a mixed use development, which delivers a significantly enhanced landscape and uses

⁶ <https://www.southdowns.gov.uk/wp-content/uploads/2019/07/Sustainability-Appraisal-Report-and-Addendum.pdf>

compatible with the purposes of the National Park, namely tourism / visitor based recreational activities and employment uses.

- I.23 In addition, the preferred approach of the Local Plan sought to resist 'more development than is necessary to secure and deliver the environmentally led restoration of the site'. In this context the preferred approach will help to both protect and support enhancements to the landscape character, biodiversity, and cultural heritage.
- I.24 The first stage of the SA process is setting the context and objectives, establishing the baseline and deciding the scope of the SA. An SA scoping report for the AAP was prepared in 2021. In August/September 2021, The National Park Authority consulted the statutory bodies namely the Environment Agency, Natural England and Historic England, the two local authorities in which the site is located namely Horsham and Adur District Councils, West Sussex County Council and the local parish council namely Upper Beeding Parish Council. The Scoping Report⁷ was subsequently updated following comments from the consultees and feedback from these groups has informed the SA of this Issues & Options document.
- I.25 An SA of the Issues & Options has been published alongside the AAP. The SA includes a number of sustainability objectives, as set out in the Scoping Report, that have been used to appraise the issues and options on an iterative basis. These iterations identify how emerging options for the site will help to achieve the relevant social, environmental and economic objectives and will recommend how sustainability could be improved.
- I.26 This Issues & Options AAP sets out a number of reasonable alternatives that are appraised through the SA. In order for the AAP to be justified it needs to have an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Habitat Regulation Assessment

- I.27 The objectives of the Habitat Regulation Assessment (HRA) of the AAP are to:
- Identify any aspects of the AAP that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, 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.
- I.28 In the early stages of AAP preparation we undertook an HRA screening following the principles established in the HRA for the Local Plan. This screened out potential

⁷ Shoreham Cement Works Area Action Plan Sustainability Appraisal / Strategic Environmental Assessment UPDATED SCOPING REPORT, SDNPA, 2021

issues and concluded no Appropriate Assessment was needed. However, since then the issue of water neutrality has emerged in the Sussex North Water Resource (Supply) Zone. The decision was made in 2022 to re-do the HRA screening⁸ and this concluded that an Appropriate Assessment of the AAP is required. This is not required at the Issues & Options stage of plan preparation, but is required at the Preferred Option stage.

- I.29 Going forward, the SDNPA are working jointly with other affected Local Planning Authorities on a study and strategy to achieve a strategic solution for development on this matter across the Sussex North Water Resource (Supply) Zone.

Engagement with stakeholders

- I.30 The views and input of the local community are vital to us. We would very much like to hear your views on the redevelopment of Shoreham Cement Works particularly if you have never commented on a planning document before. We have set up an online consultation that you can access on your mobile or computer. This includes drone footage and photos of the site.
- I.31 We recognise that there are two main community groups with an interest in the site and we are working closely with both. Firstly, the Parish Council for Upper Beeding where the site is located and secondly the Shoreham Society, which represents people living to the south of the site in the town of Shoreham-by-Sea.
- I.32 The site was purchased by the Dudman Group in 2017 and we have sought to engage with the company owner, Mr Dudman, throughout the preparation of this document.

Question 1: How could the redevelopment of Shoreham Cement Works contribute to the purposes and duty of the National Park?

⁸ Habitats Regulations Assessment (HRA) Screening Statement: Test of Likely Significant Effects, SDNPA, 2022