

# Shoreham Cement Works Area Action Plan Issues & Options

## Summary of Responses

### Chapter 1: Introduction

There were a total of 147 responses to this chapter. These consisted of 9 general comments on the chapter and 138 responses to Question 1.

There were a total of 9 general comments on this chapter. These are summarised below.

#### National Agencies

No general comments were received from National Agencies in relation to Chapter 1.

#### District, Borough, City and County Councils

**Adur & Worthing District Council (AWDC)** commented on the Sustainability Appraisal (SA). AWDC suggested that the focus of residential development should be tested for each of the site areas. In addition, and in relation to Paragraph 3.19 of Chapter 3 in the SA, AWDC commented that the area is at risk of surface water flooding, and the southern section is identified as being at high risk of future tidal flooding due to climate change. As such, it is unclear how the proposed development scenarios accord with the NPPF's sequential approach in relation to directing the most vulnerable uses to areas of lowest flood risk.

**Horsham District Council (HDC)** supported the principle of redevelopment given the site's previous allocation for employment, leisure, and tourism uses in the Horsham District Core Strategy (2007) and the Site Specific Allocation of Land (2007). The use of evidence bases prepared by SDNPA, HDC and other Local Authorities (LAs) was acknowledged by HDC – namely the Upper Beeding Housing Needs Survey (2014), SDNPA Strategic Housing Market Assessment (SHMA) (2015), SDNPA Housing and Economic Development Needs Assessment (2017), and the Adur & Worthing SHMA (2020). Notwithstanding the above, HDC commented that the Natural England Position Statement (September 2021) requires new development within the Sussex North Water Resource (Supply) Zone to demonstrate water neutrality. As such, the impact of any redevelopment at Shoreham Cement Works on Water Neutrality will need to be considered, and the joint work between SDNPA, HDC, Chichester District Council (CDC), and Crawley Borough Council (CBC) - to achieve a strategic solution for development - will need to continue.

**Mid Sussex District Council (MSDC)** raised an **objection** to the development scenarios as they; lack detail; appear too modest; and include a rigid segregation of commercial/employment and residential uses which risk missing an opportunity to create a greater mix of residential uses across the Riverside, Cement Works, and Bowl Area. MSDC has urged the SDNPA to articulate a **Preferred Option** which includes a **master plan**. The master plan should define parameters and indicate layout, massing, mix, quantum, and scale of development. At the same time, the SDNPA should continue to explore and fully justify the proposed mix of commercial uses. Finally, MSDC explained that achieving successful place-making needs to be at the heart of the AAP, providing a scale of development which can support a balanced community that provides homes, employment, day-to-day services, education, and leisure opportunities as a single development.

#### Parish and Town Councils

No general comments were received from Town and Parish Councils in relation to Chapter 1.

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#### Other Organisations

The **Sussex Ornithological Society** challenged the assumptions that development is inevitable and that “do nothing” is not a reasonable alternative. The Society felt that it would be more in keeping with the purposes of a National Park if expenditure is minimised to clearing some of the buildings, and for the site to then be closed to the public and left to re-wild naturally. The Society stated that the sum of money needed suggested an outcome in which none of the development scenarios would be likely to come forward unless more housing/industrial units are proposed. Finally, the Society raised concern as to whether the options are the best way to improve the landscape, and that introducing residents and visitors would significantly disturb wildlife (incl. birds).

The **Sussex Wildlife Trust** commented that the ambition for the restoration of the natural environment, to address the **biodiversity and climate crises**, have increased at pace. The SDNPA needs to consider if the proposed commercial and residential aspects (which have potential for the restoration of nature), is in line with the Government’s environmental ambitions and subsequent direction for National Parks from the **Glover Review**. The Trust believed that given the history of the site, there is a responsibility to enable nature to restore itself, and so the Trust did not agree with Section 4.30 of the Sustainability Appraisal (SA) which stated that the “Do Nothing” scenario is the least sustainable option. The Trust questioned whether the “Do Nothing” scenario would really have a negative impact against the biodiversity and climate change objectives, and so the Trust felt that the potential for Nature Recovery has not been considered separate to commercial and residential units. The Trust believed that delivering for Nature Recovery is not a “Do Nothing” option but, instead, an active and positive choice for biodiversity, people, and climate; it should be actively explored, and the potential for biodiversity should be fulfilled.

#### Individuals

The following general comments were received from three (3) individuals:

- Surprise at presumption in favour of development given wildlife and landscape features.
- The cement works is a liability in terms of asbestos and community safety.
- The buildings are not seen as heritage assets in need of preservation.
- Urgent action is required, and Compulsory Purchase Powers (CPO) should be considered.
- Agreement that redevelopment is “Major Development” and “Do Nothing” is not an option.
- Question around whether 400 homes could be delivered on chalk.

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

There were a total of 138 responses to this question. These are summarised below.

#### National Agencies

No comments received from National Agencies in relation to Q1.

#### District, Borough, City and County Councils

**Adur and Worthing District Council (AWDC)** supported the principle of an AAP and the aspiration for an exemplar, mixed-use development that would; conserve and enhance the landscape

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and scenic beauty of the National Park; and conserve the cultural heritage and legacy of Shoreham Cement Works (SCW).

**Hampshire County Council (HCC)** supported the opportunity for “an exemplar sustainable mixed use development” which they believed would meet the National Park’s purposes and duty.

### Parish and Town Councils

**Upper Beeding Parish Council (UBPC)** identified opportunities for development and employment at the site – as part of a regeneration and restoration package - in the Upper Beeding Neighbourhood Plan. UBPC supported Policy SD56 in the South Downs Local Plan and commented that development must; be sustainable and carbon neutral; and secure environmental and landscape improvements compatible with the site’s sensitive character and location within the National Park.

### Other Organisations

The **Adur Collective Community Land Trust (ACCLT)** suggested that the area within Adur District Council’s (ADC) administrative boundary should be “ring-fenced” for affordable housing to be delivered and managed by the Trust. The ACCLT commented that it could use its community support and commercial fund to provide long-term affordable rental homes (with rent rates linked to local wages) for Adur’s residents.

The **Greening Steyning Group** stated that the redevelopment of Shoreham Cement Works (SCW) could become a model for how to reclaim brownfield sites and turn them into real assets.

The **Lancing College** was in favour of appropriate redevelopment at Shoreham Cement Works (SCW). However, any solution would need to; be financially viable; and respond to the environmental, ecological, and transport sensitivities of the local area.

The **Shoreham District Ornithological Society** believed that, to contribute to the purposes and duty of the National Park, any strategy would need to conserve and enhance natural wildlife and beauty; whilst also promoting opportunities for the understanding and enjoyment of the National Park’s special qualities.

The **Sussex Campaign to Protect Rural England (CPRE)** stated that the Shoreham Cement Works (SCW) creates a large and visible scar in the National Park. The CPRE also stated that it is difficult and unsafe to cross the A283 onto the Downs Link and South Downs Way (SDW), and that vehicular traffic threatens walkers and riders seeking to follow bye ways and through routes. The CPRE welcomed the removal of industrial buildings, restoration of contaminated land, and rewilding. The above would be closely related to the National Park’s purposes and duty. Finally, the CPRE commented that contributing to housing, business, and/or leisure development would be seen as supporting those who only seek to monetise previous countryside.

The **Sussex Ornithological Society** believed that circumstances have changed since the adoption of the South Downs Local Plan, and that the biodiversity and climate crises justify the need for greater action to allow nature recovery. The Society believed that Policy SD56, and the proposed development scenarios, would not contribute to the purposes of the National Park, and would be in opposition to **Paragraph 177** of the **National Planning Policy Framework (NPPF)**. This is because the redevelopment would not constitute exceptional circumstances and would not enhance

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the landscape. The Society suggested that the existing buildings are demolished, and the site is kept closed to visitors (albeit with viewing points along the A283 and/or cliff edge), so that the site can be left to re-wild for the benefit of nature. The Society believed that it would require £2.8 million to demolish the existing buildings, and that the above suggestion would avoid the need for £27 million to redevelop the site. Finally, the Society stated that any major “honey pot” development – which would create increases in traffic and recreational pressure – should be ruled out.

The **Whaleback Planning Consultancy** believed that the redevelopment of Shoreham Cement Works (SCW) could contribute to the purposes and duty of the National Park by:

1. Purpose 1: Retaining cultural artefacts/buildings, removing unsightly / derelict buildings, creating new habitat, restoring the land, and conserving existing wildlife; and
2. Purpose 2: Provide landscape restoration, public access and non-intrusive tourism uses for educational; facilities and accommodation; and
3. Duty: Provide affordable housing, employment opportunities, and community facilities to create a cohesive and balanced community.

The SDNPA Design Team believed that the redevelopment of Shoreham Cement works could contribute to the National Park’s purposes and duty through the retention of cultural heritage, and the delivery of affordable housing, public access, re-naturing, and visitor attractions.

### **Individuals**

Overall, many individuals believed that Shoreham Cement Works (SCW) is an “eyesore”. However, there was no overriding consensus as to whether all existing buildings should be removed or retained in relation to the site’s character, heritage and legacy.

There was one individual who stated that the purposes of the National Park are “irrelevant” to the redevelopment of SCW. Conversely, there were 6 individuals who stated that the redevelopment of SCW would not contribute to the purposes and duty of the National Park. Of these, one individual suggested that the site should be removed from the South Downs National Park (SDNP) boundary, and that a “buffer zone” and/or “ecological corridor” should be created to hide the site from views within the National Park.

There were 25 individuals who believed that the only way that SCW could contribute to the purposes and duty of the National Park, is for the entire site to be restored to its former landscape and enhanced (and better connected) for nature and wildlife conservation, and for there to be no (or very limited) development on site. More specifically, 6 individuals explicitly expressed that there should be “no housing”. As part of the above, many of these individuals wanted the site to be left alone to re-wild. Specific individuals stated that the site could be used; to create new wetlands; to contribute to bat and bird populations (i.e., the Chimney could be used for a Swift nesting site); to provide volunteering and educational opportunities; and to promote the public access, understanding, and enjoyment of the National Park. With this in mind, 3 individuals referred to the examples of Land south of A26 (Lewes), Knepp Estate (Sussex) and Wilder Blean (Kent).

The majority of individuals appeared to favour an “exemplar scheme” which is sensitively and sympathetically designed to enhance the biodiversity, character, landscape, and sustainability of the area, whilst responding to climate change. Indeed, many individuals referenced the biodiversity, climate and pollution crises, with 6 individuals explicitly requesting the need for development to be Net Zero Carbon and/or include renewable technology. Individuals did not want to see a “generic”

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or “dormitory car based” development and, instead, wanted to see redevelopment which protects the environment, conserves cultural heritage, and is open to community and public use, whilst contributing to the local area, businesses and economy. In terms of the development scenarios, a mixed use leisure-led scheme was favoured over a mixed-use employment led scheme – 6 vs 3 individuals respectively – and individuals suggested that housing development should be limited to between 100 and 240 dwellings. One individual recommended the development of a self-sustaining village with all services in the “middle” of the site. Finally, 6 individuals favoured the delivery of affordable and community-owned housing.

There were 28 individuals who believed that SCW could contribute to the purposes of the National Park if it was to become a “Destination” for sustainable tourism and leisure. More specifically, individuals suggested the delivery of a Visitor/Education Centre (with café, toilets, bicycle hire, and museum / exhibition space), Hotel, Theatre, and/or an Indoor and Outdoor Leisure Centre. The suggestions for the latter included a MTB course for cyclists, a lake, a swimming pool, a zip wire, a pirate ship, rope walks, outdoor ski slope, outdoor surf centre, and climbing walls (including the Cliffs if safe). As part of the above, individuals referenced the following examples: the Eden Project in Cornwall (4), Knepp Castle Estate in Sussex (2), Duisburg Nord in Germany (1), the Wave near Bristol (1), and the Spectrum Centre in Guildford (1). These individuals believed that a leisure offer would attract locals and visitors and help them to enjoy, and increase their understanding of, the National Park.

Finally, there were 10 individuals who commented on the transport network. The majority wanted to see the creation of new, and better connection of existing, active travel routes. More specifically, individuals commented on the opportunity to connect the site to the Downs Link and the South Downs Way (SDW). In addition, 2 individuals suggested a tram link to Shoreham, and a bridge over the River Adur.