# Shoreham Cement Works Area Action Plan Issues & Options Summary of Responses

# **Chapter 5E: Nature Recovery**

There were a total of 204 responses to this chapter. These consisted of 16 general comments on the chapter and 93 responses to question 11 and 95 responses to the question 12.

There were a total of 16 general comments on this chapter. These are summarised below.

#### **National Agencies**

The Environment Agency commented that the River Adur is an Eel and Sea trout migratory route – any works proposed as part of the chosen scenario must not impede migratory fish and eel passage in the River Adur. It should be noted that Water vole presence has been recorded within Ikm of the site. Any proposed works along the river bankside will require consultation with a suitably qualified ecologist. They stated the Riverside should be conserved and enhanced as a riparian corridor, linking with other habitats both upstream and downstream, and could include floodplain and saltmarsh restoration but this would be limited in scenario I.

# District, Borough, City and County Councils

None.

### **Parish and Town Councils**

None.

## **Other Organisations**

The Shoreham Society commented that the site should be returned to natural habitat with trees, shrubs and grassland to blend with the surrounding downs and with an educational centre that will leave a lasting legacy for generations to come.

The Sussex Wildlife Trust commented that consultation has not considered the sit as a strategic site for nature. They state that income could be generated by green finance and so is not a 'do nothing scenario'. They state that given that the Shoreham Cement Works is nestled within a number of designated sites, and is currently within the area highlight through the Weald to Waves Project, its importance within that emerging network for biodiversity should not be underestimated. They note the findings of the Preliminary Ecological Appraisal and state this biodiversity has flourished in the absence of intense human activity.

The Sussex Ornithological Society commented that the area is of considerable importance for birds, noting records of red-listed, amber-listed, Schedule I (Wildlife and Countryside Act 1981) and Section 41 (Natural Environment & Rural Communities Act 2006) species. The chimney was noted for its use as a perch by Peregrines and it could be adapted or replaced to supporting nesting. The 'brownfield' / 'waste ground' character of the site was noted as providing habitats for insects, small mammals and birds, supporting various life cycle stages. It was commented that such sites and habitats are increasingly being lost with the cumulative loss of these habitats having a huge impact, and many species are already in serious decline. In a local Sussex context, the Beeding Cement Works is a superb example of a large area of exactly the sort of valuable wildlife habitat.

Henfield Birdwatch endorsed the Sussex Ornithological Society comments and not the opportunity to improve the area for wildlife such as Peregrines and Ravens.

The Shoreham District Ornithological Society requests considerations of the potential for detrimental impact that the development of the Cement Works may have on birds known to be

#### **Summary of Responses**

present from records and surveys, particularly citing the Clifflands, Bowl and Moonscape areas and the presence of Peregrine Falcon, and the Bowl area with regard to Ravens. They state a specific survey is needed for Black Redstarts as the site is likely to be attractive and likely discouraged by development. They request that plans for the site might be developed with reference to the Adur Landscape Regeneration Project.

The Aquifer Partnership commented that there is an opportunity to consider SuDs and BNG at the early design stages. They say there are considerable complementary benefits that can be achieved by linking good quality, landscape-led SuDS design to benefits to people and nature. They would like any proposals to adopt a recognised approach to Biodiversity Net Gain such as the UK Benchmark standard 'Building with Nature' which provides a recognised and pioneering approach to development.

#### **Individuals**

8 individuals favoured the site being used for rewilding / nature recovery.

2 individuals stated the Peregrines and Ravens should be protected.

One individual raised concern about damage to the adjacent Anchor Bottom site during any proposed development of the cement site, noting Anchor Bottom provides habitat which supports the Adonis Blue Butterfly, orchids and other plants necessary for pollinators and other insects.

# Question II: In which area(s) of the site should the focus be for biodiversity protection, enhancement and creation?

There were a total of 93 responses to this question. These are summarised below.

#### **National Agencies**

None.

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

Adur and Worthing District Council commented that it is understood that the five areas of the site offer different opportunities for nature recovery. They support the design principles in the Local Landscape Character and Sensitive Study (May 2022) that relate to delivery of green and blue infrastructure for positive impacts on character and people, connecting ecological sensitive areas across the site and following the contours to connect with the Adur. The Council would welcome the opportunity to explore the wider connectivity and 'joining up' of a nature recovery network. This stretch of the Adur river will be an important part of the Weald to Waves project.

#### **Parish and Town Councils**

Upper Beeding Parish Council commented the Cliff lands, Bowl and Moonscape areas are those which have been identified as being able to best provide and protect wildlife habitats and maximise the landscape and biodiversity either entirely (The Cliff lands) or partly (the Bowl and Moonscape) with the introduction of some no build zones or natural parks.

Findon Parish Council commented that there should be a focus for biodiversity protection on the moonscape, cliffs, bowl and cement works areas.

Kingsley Parish Council commented that all areas that have potential of losing their current plants, animals etc. should be protected.

#### **Summary of Responses**

## **Other Organisations**

Greening Steyning favoured maximising biodiversity in the bowl, moonscape and cliff lands area, retaining chalk grassland and woodland in the cement works area, and a buffer along the river for birds. There should be nature friendly design in all aspects of newly built infrastructure.

Campaign to Protected Rural England (CPRE) commented that as far as possible the whole site should be protected and restoring and improving biodiversity and soil quality should be a core purpose and is more important that development, especially for the South Downs National Park.

#### **Individuals**

24 individuals favoured protecting the whole site.

Other individuals favoured one or more of the following:

- 13 The Riverside. A further 5 individuals said there should be some protection and enhancement for nature along the river corridor alongside development.
- 4 The Cement Works
- 27 The Bowl
- 24 The Moonscape
- 35 The Cliffs

The following individuals cited other areas/considerations:

- I Area around the main road
- 5 The periphery/edges of the site to frame development support habitat connectivity
- 2 Areas with the most established habitats
- 3 Anywhere with protected plans and wildlife
- 2 The Bowl and/or moonscape should be a lake/pond

I individual stated no areas should be protected and that the prime focus should be maximining the number of houses.

7 individuals made a broader point that any/all areas with development should be sensitively designed / have 'green design'/ have biodiversity running as a theme through all areas.

I individual stated the site should be self sufficient and any building should be built without need for external resources.

I individual favoured Eden Project style structures to enhance SDNP.

I individual stated that any development should contribute positively to the Weald to Waves project.

I individual stated that dark skies should be kept as much as possible for bats.

# Question 12: Should buildings and structures contribute to nature via green roofs and walls or should these surfaces support solar energy or a mixture?

There were a total of 95 responses to this question. These are summarised below.

# **National Agencies**

The Environment Agency commented that green roofs and walls would help any new development to blend into the surrounding area and add to aesthetics of the area whilst benefiting biodiversity.

#### **Summary of Responses**

# District, Borough, City and County Councils

Adur and Worthing District Council commented that both green roofs and solar panels can coexist. They say evidence suggests that green roofs help to cool the solar PV panels, which improves the efficiency of the panels. They also raise other sustainability interventions of rain gardens and Suds to increase biodiversity.

#### **Parish and Town Councils**

Upper Beeding Parish Council commented there is need to utilise areas for solar energy rather than have green roofs as a requirement and to ensure the design is truly outstanding and innovative to provide new sources of power.

Findon Parish Council commented that buildings and structures should contribute to nature via a mix of green roofs/walls and solar energy.

#### **Other Organisations**

Greening Steyning commented consideration should be given to both, depending on ability to maximise solar efficiency.

Campaign to Protect Rural England (CPRE) commented that a mixture of green roofs, walls and sustainable energy for the site and beyond should be an attractive goal with the variety of orientations on the site offering significant opportunities for green renewable energy production and solar farms, especially the cliff faces. Also notes string westerly winds and potential for wind power.

Cyrrus Brighton City Airport raised the issue of glint from solar panels and impact on Air Traffic Control, ground staff and aircraft. Therefore, it will be essential for any proposed Solar Panels to be fully assessed prior to their installation.

#### **Individuals**

53 individuals favoured a mixture of both green roofs/walls and solar energy. Of which:

- One individual favoured roofs for solar power and green walls.
- One individual favoured green roofs and solar elsewhere central on the site.

7 individuals favoured solar energy.

5 individuals favoured green roofs and walls.

8 individuals commented 'yes' but did not state which of the three options in the question they supported.

I individual said neither to green roofs/walls or solar on the basis that they will become decrepit and disused.

7 individuals commented that there should be no development/buildings, most of which cited enhancing biodiversity or rewilding for the site instead.

6 individuals commented that for any solar there should be a maximise the opportunity of the design for energy production benefits.

3 individuals said the site should be an exemplar in sustainability.

I individual stated that buildings should be integrated into green surrounds with no physical boundaries and all space shared.

I individual said all roofs should have accessible terraces which contain plants and flowers.

# **Summary of Responses**

19 individuals also mentioned there should be other sustainability interventions in addition, such as bird / swift boxes, bee bricks/hotels, sustainable drainage, rainwater harvesting, passive house design, carbon neutrality, general sustainable construction / 'green design', wider energy sources including ground source heat pumps and wind power generation.