

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

Chapter 6: The Way Forward

There were a total of 275 responses to this chapter. These consisted of 0 general comments on the chapter and 76, 108, and 91 responses to Questions 26, 27 and 28 respectively.

Question 26: Are there any particular ideas, issues or policies you would like to see in the Preferred Option AAP?

There were a total of 76 responses to this question. These are summarised below.

District, Borough, City and County Councils

Adur & Worthing District Councils (AWDC) would welcome clarity on the approach to delivering biodiversity net gain (BNG), and for the AAP to address the use of Design Codes.

Hampshire County Council (HCC) recommended the development of plans and policies in relation to blue and green infrastructure, biological networks, and the River Adur floodplain. In addition, the findings of the Landscape Study, along with any other guidance about what work is needed to support any forthcoming proposal, should be included in the Preferred Option AAP.

Horsham District Council (HDC) recognised and welcomed the references made in relation to the site's relationship with the nearby settlements of Bramber, Shoreham, Steyning and Upper Beeding. However, the HDC would like to see greater consideration on the impacts of existing communities in regard to infrastructure, retail, and transport.

West Sussex County Council (WSSCC) stated that the Transport Assessment was undertaken with a lack of representative observed traffic flows due to the Covid-19 pandemic. As such, the Transport Assessment will need to be supplemented with new observed traffic flows (and the junction assessments calibrated to those) prior to the Regulation 19 consultation on the AAP. Notwithstanding the above, the Transport Assessment is missing an analysis of the number of trips to, and from, principal trip attractions for site-generated trips that could be made by sustainable modes of transport. The analysis should underpin the development of off-site infrastructure measures that are expected to come forward as part of the redevelopment. In addition, further investigation is required for the costs, design, and provision of cycle hire schemes and electric charging facilities for e-bikes to improve the generation of non-motorised trips from the site to attraction areas.

Parish and Town Councils

Findon Parish Council (FPC) would like to see an emphasis on the site's cultural heritage and the delivery of an educational facilities for schools.

Upper Beeding Parish Council (UBPC) would like the AAP to identify the developer and funding sources. UBPC previously commissioned the "ZED Factory" to provide plans and ideas for the site to help support work on the preparation of the Upper Beeding Neighbourhood Plan. These plans considered 650 zero carbon homes, along with hotels, leisure and employment uses, to help cover the costs/funding for the site. Finally, UBPC suggested these plans and vision could be reviewed as part of the emerging AAP.

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

Other Organisations

The **Adur Collective Community Land Trust (ACCLT)** would like to see a policy about a proportion of the housing development being delivered by the Trust or an alternative community housing model. The Trust explained that “Community Owned Housing” is a model of housing that retains homes as community assets in perpetuity in order to contribute to long-term community wealth and wellbeing. In addition, the site offers a unique opportunity to showcase more modern and sustainable methods of construction that reduce energy and living costs.

The **British Horse Society** stated that, in the local area, there are over 1700 passported horses contributing £10m per annum to the economy. The busy main road has rendered connections to the existing public rights of way (PRoW) “impossible”, with the existing road crossing being dangerous. There have been past requests for a signalised crossing, and/or for the existing underpass to be used for non-motorised users (NMUs). The existing underpass could then be connected to the Downs Link and South Downs Way (SDW).

The **Friends of the South Downs** welcomed the preparation of the AAP for the purposes of guiding future development, and would like to assist in the production of an exemplary example of mixed-use development which is of local and regional importance.

The **Shoreham District Ornithological Society** would like to see connection and reference to the Adur Landscape Regeneration Project and the “Weald to Waves” Project. As part of the above, farmers and landowners are committing to various nature regeneration schemes to provide a wildlife corridor from the Weald to the Sussex Coast. It appeared to the Society that only Ladywells and Pad Farm are committed within the SDNP section of the watercourse. The Society suggested that the site (whole or in part) is placed within the context of the Adur Landscape Regeneration Project. This suggestion particularly applies to the Riverside due to its visibility and vegetation which supports birdlife.

The **Shoreham Society** suggested a recycling plant and incinerator. The above would need to be free from noxious emissions and any energy generated could help Shoreham.

The **Sussex Campaign to Protect Rural England (CPRE)** would like to see; (1) the redevelopment address a ravaged area of the Downs rather than a building site for housing and retail; and (2) the site owners contribute to the cost of removing any pollutants and hazardous waste for which they are responsible.

The **West Sussex Local Access Forum (WSLAF)** commented that the majority of the Downs Link is a Public Right of Way (PRoW), but that a short section which runs alongside the River Adur is marked as a “permitted bridleway”. The Forum would like this anomaly to be addressed. In addition, the Forum has requested that a loop / link from the site to the South Downs Way (SDW) is created for non-motorised users (NMUs).

SDNPA Design Team would like to see; a carbon negative development; sustainable travel; and opportunities for education in biodiversity, culture, and geodiversity.

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

Individuals

There were multiple responses which overlapped across Q26-28. A number of individuals either combined their answers to Q26-28 in a response to one of the questions, or replicated the same answer for all three questions. In order to ensure that responses and public opinion have been captured correctly (as much as possible), the individual responses have been appropriately split up / divided across Q26-28. A summary of the responses to Q26 is below.

The comments submitted by individuals in relation to Q26 broadly mirror the answers submitted to earlier questions. In general, respondents wanted to see the conservation and enhancement of; biodiversity, scenic beauty, wildlife and the environment (including nature recovery) [15 individuals]; cultural heritage and local history [4 individuals]; and the landscape [1 individual]; along with chalk habitat restoration [1 individual] and the promotion of educational opportunities linked to the above [1 individual]. As per the responses to previous questions, individuals would also like to see the delivery of a visitor centre and café [2 individuals]; green space [1 individual]; and a nature trail [1 individual]. Moreover, 10 individuals would like to see a sensitively planned, appropriate, innovative and sustainable Preferred Option which is carbon neutral, is of high-quality design, and includes renewable energy generation; whilst an alternative 8 individuals would like to see the site returned to its pre-developed state and left alone to re-wild.

In terms of the type of development, there were 3 individuals who explicitly stated that they would like to see development (as a whole) minimised, with a further 2 and 3 individuals who specifically stated that they would like to see housing and employment development kept to a minimum respectively. Conversely, 3 and 5 individuals wanted to see the redevelopment focus on housing and commercial development respectively, with 2 and 3 individuals specifically referring to the need for affordable/community led housing, and artisan and local start-up opportunities, respectively. More specifically, a further 1 individual and 2 individuals would like to see the delivery of Option 2 (mixed use with employment) and Option 3 (mixed use with leisure) respectively. Notwithstanding the above, some individuals questioned if a greater quantum of development was required to create a viable community with its own school, health facilities, and power generation.

As for health and leisure opportunities, 6 individuals wanted to see an emphasis placed on these issues/uses. However, the specific suggestions ranged from generic outdoor activities to built sport proposals with floodlighting. The latter was suggested by a local football club who wanted to be involved in the redevelopment of the site. In terms of softer outdoor activities, individuals replicated their responses to previous questions in relation to; the delivery of safe crossings and enhancements along the South Downs Way and Downs Link [3 individuals]; and public access to the river [1 individual]. More specifically, 1 individual would like to see the re-connection of the old railway line whilst retaining the Downs Link alongside it. Continuing on the topic of transport options and improvements, 3 individuals would like to see a more detailed transport plan which considers sustainable modes of travel, impacts on nearby settlements, and whether traffic could be manageable without the delivery of a roundabout.

Furthermore, individuals would like to see the Preferred Option consider and link to; the River Adur Development Plan; the Shoreham Development Plan; and the SDC/JC Shoreham Cement Works Study. It is also noted that individuals wanted to see a more user friendly consultation process, and policies relating to SuDS and sustainable water management measures on site (i.e., water efficiency measures, grey water recycling, rainwater harvesting etc.). Finally, 1 individual submitted the example of a home by Ricardo Bofill Taller de Arquitectura which was a former cement factory.

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

Question 27: Have you got any other comments on Shoreham Cement Works?

There were a total of 108 responses to this question. These are summarised below.

National Agencies

The **Environment Agency (EA)** commented that the site is in an intrinsic zone of darkness in the Dark Sky Reserve and, as such, is susceptible to light pollution. The Clifflands have been identified as being unsuitable for development (due to stability) and presence of bat populations. The construction methods around this area may need to change to reduce disturbance and light pollution. Notwithstanding the above, any proposed development, works, and/or structure in, under, over, or within 16m of the top bank of the River Adur will require a Flood Risk Authority Permit under the Environmental Permitting (England and Wales) Regulations 2016 from the EA. A permit is separate, and in addition, to Planning Permission. The granting of Planning Permission does not necessarily lead to the granting of a permit, and the EA recommended early engagement as plans develop. Finally, further information about permits can be found here:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

The **Health & Safety Executive (HSE)** commented that they are not a statutory consultee, and that HSE's published methodology and GIS tools (<http://www.hse.gov.uk/landuseplanning/>) should be used to ensure that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites, and nuclear installations. In addition, you should contact the Office of Nuclear Regulations for any nuclear installations within or nearby the local plan area. Notwithstanding the above, see Paragraphs 65 to 69 for an LPA's responsibilities when taking public safety into account in planning decisions and formulating local plans: <https://www.gov.uk/guidance/hazardous-substances>

Natural England has a statutory purpose to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, and thereby contributing to sustainable development. The AAP does not pose any likely risk or opportunity in relation to the above statutory purpose and so Natural England did not wish to comment on this consultation. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that may help the LPA to fully take account of any environmental risks and opportunities relating to this document. If the SDNPA disagree with Natural England's assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, the SDNPA must consult Natural England again.

District, Borough, City and County Councils

Adur & Worthing District Council (AWDC) noted the viability issues related to the site. AWDC commented that the BPS Study found that all development scenarios would make a loss (with or without affordable housing). The Study showed a "best case" scenario where Option 1 (Employment and 400 homes) and Option 2 (Employment and 240 homes) could breakeven and be viable respectively. However, the above would include options around 100% private market homes, a small proportion of affordable homes, and/or a financial contribution in-lieu of providing on site affordable homes. In terms of environmental health, the land is old chalk pits, used for storage of

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

vehicles and other tanks, and a there was a significant fire on site some years ago. The site (within Adur's administrative boundary) may be infilled with unknown material and, as such, ground contamination would need to be ascertained. Given the site's location next to the River Adur (Controlled Waters), the Environment Agency (EA) would need to be consulted on any development and proposed land remediation. Finally, the potential health impacts to new and existing residents in the locality would need to be considered in relation to lighting, noise and traffic during construction and operational use.

Hampshire County Council (HCC) commented that difficult access to the site has led to significant gaps in the information gathered. The AAP could set out what is needed to develop the required robust evidence base. An important aspect would be "future proofing" to ensure innovative solutions are found to current, emerging, and future environmental issues. An example includes the potential to enhance blue and green infrastructure.

Surrey County Council (SCC) stated that they do not have any comments at this stage.

West Sussex County Council (WSSC) commented that Shoreham Cement Works is an inactive chalk quarry with remaining chalk reserves and an aggregated recycling facility. The former and latter are safeguarded by Policies M9 and W2 respectively of the West Sussex Joint Minerals Local Plan. Reference should be made to these documents and the safeguarding of the site so that the SA/SEA considers the impact of the loss of the reserves and the waste facility.

Parish and Town Councils

Findon Parish Council (FPC) commented that the site is a one-off opportunity to create a unique development that enhances the natural landscape, and minimises vehicle usage by incorporating good public transport and Public Rights of Way (PRoW). The site should be designed to be a "showpiece" and Net Zero carbon – i.e., no gas in homes, water recycling, waste treatment, and the maximisation of renewables.

Sompting Parish Council (SPC) commented that they are following the progress but have agreed not to formally comment at this stage.

Upper Beeding Parish Council (UBPC) commented that they hope to see progress in the next 5 years to produce a plan and start the delivery of something that the majority of stakeholders wish to see. UBPC did not want the site to remain in its present derelict state, and any development must ensure that the Downs Link is maintained during construction, albeit a temporary diversion may be required during construction.

Other Organisations

The **Adur Collective Community Land Trust (ACCLT)** commented that the unique nature of the site means that there is an opportunity to showcase alternative ways of approaching development, this should include a proportion of affordable housing being delivered by the ACCLT. The Trust commented that it is time that this landmark site is used to create jobs and shape how people can live in different ways.

The Aquifer Partnership (TAP) commented that the site presents an opportunity to showcase exemplar future proof planning, and could include pollution prevention, biodiversity net gain, and environmental best practice. Further opportunities include; to showcase national and local policy

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

aims to an attractive, highly visible, and practical way; to demonstrate responsible development in a sensitive location (a source protection zone); and to add value as a model for sustainability.

Brighton City Airport commented that the site is within the 6km “crane circle” associated to the airport. Cranes have the potential to impacts on the Obstacle Limitation Surfaces (OLS), IFP and Navigational Aids. As such, prior to the erection of any cranes, full construction details should be provided to the airport so that the necessary Aerodrome Safeguarding Assessment can be undertaken.

The **Coal Authority** commented that the South Downs National Park (SDNP) is outside the defined coalfield and, therefore, the Authority has no specific comments to make. In addition, the Authority explained that it will not be necessary for the SDNPA to provide the Coal Authority with any future drafts or updates of the emerging plans, and that the submitted letter to the Reg 18 consultation can be used as evidence for the legal and procedural consultation requirements at examination if necessary.

The **Civil Aviation Authority (CAA)** did not have any additional comments but wanted to ensure that Shoreham Aerodrome were consulted.

The **Friends of the South Downs (FSD)** commented that the AAP is currently a strategic matter and, as such, the FSD has not provided any comments on design and layout at this time.

Gatwick Airport commented that the site is approximately 30km south-south-west from the Aerodrome Reference Point (ARP). Although the site is currently outside of the safeguarding zone for developments (15km), the safeguarding zone in relation to Instrument Flight Procedures (IFPs) will possibly be extended to 55km in late 2022 / early 2023 (to be confirmed). Moreover, any building or structure exceeding 150m above ground level will need to be referred to the airport for assessment. Notwithstanding the above, the airport’s operation must not be impacted upon by buildings, structure and/or works which infringe the protected Obstacle Limitation Surfaces (OLS). The navigational aids utilised by the airport must also not be impacted, and any development must not include distracting or confusing light, nor have the potential to increase number of birds or the bird hazard risk.

The **Greening Steyning Group** would like to see habitat enhancements areas to the wildlife corridor along the River Adur Valley, and requested that they are considered as official consultees for future plans given their mailing list (1000+) and partnership working with local conservation and wildlife groups.

The **Hampshire Constabulary** commented that the site is in West Sussex and, therefore, they did not have any comments.

The **Hampshire Campaign to Protect Rural England (CPRE)** supported the comments made by the Sussex Campaign to Protect Rural England (CPRE).

The **Henfield Birdwatch** stated that they wanted to see; a full Ecological Survey undertaken; the site cleaned up; and a wildlife enhancing project taken forward by the SDNPA.

Lancing College stated that they were impressed by the comprehensive and thoughtful nature of the AAP; however, no formal comments were provided as the College’s Governing Body had not had a chance to discuss the document and prepare a formal conclusion / response.

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

The **National Air Traffic Service (NATs)** had no comments to make on the AAP as it does not operate any infrastructure in the vicinity of the site and, therefore, did not anticipate any impact from redevelopment.

The **South Downs Network** commented that they were concerned that the consultants have not been allowed to access the site this did not bode well for future cooperation and redevelopment. The Network suggested that the SDNPA compulsory purchase the site to enable a range of partners to be engaged in the redevelopment of a national eco-centric centre similar to the Eden Project. This would enhance the National Park, whilst also meeting the purposes and duty of the National Park.

The **Sussex Campaign to Protect Rural England (CPRE)** welcomed the opportunity to contribute, and acknowledged the considerable effort put into the preparation of the AAP. The CPRE plan great importance in responding to climate change, biodiversity recovery, and nature recovery. The CPRE recognised the inability to extensively survey the site, and the limited desk based knowledge and understanding available – in particular in relation to pollution, hazardous waste, and viability. The Campaign explained that this undermined the practicability of the proposed development options / scenarios and, therefore, the CPRE doubted that the options constitute an effective vision. Notwithstanding the above, the CPRE recognised that “no development” or “do nothing” are not options, and that the restoration of the site and the extent of nature recovery and rewilding would be limited. Finally, the Campaign commented that SCW needs to be seen in relation to its local context and, therefore, a broader catchment and neighbourhood plan needs to be considered.

The **Sussex Ornithological Society** commented that they are the bird society for Sussex, and that they promote the recording, study, conservation, and enjoyment of birds in the county. The Society has over 2,000 members and a database of over 7 million records of birds in Sussex.

The **Sussex Wildlife Trust** commented that the future options for the site need to consider biodiversity recovery as a core objective. The Trust were keen to understand what responsibilities, expectations and conditions were, or are, in place to restore the site and the ceasing of activity. Although permission for the site is historic, other mineral extraction sites across Sussex have had their permission in place with Review of Mineral Permission (ROMP) which ensures that meaningful restoration is delivered. As such, the Trust wanted to know what the situation is for the restoration of SCW and/or if there are any suggestions for the site to be actively used for future extraction if development does not proceed.

Thames Water (TW) confirmed that the Shoreham area is not in their catchment area and that they had no comments.

The **UK Health Security Agency (UKHSA)** stated that they are not a statutory consultee and that impacts on public health from local air quality, noise and contaminated land fall under the remit of the respective Local Authorities (LA). The UKHSA commented that the SDNPA is welcome to contact them if they have any specific queries relating to potential impacts on public health from chemical and environmental hazard exposures.

The **Whaleback Planning Consultancy** commented that they are, overall, supportive of the aspirations of the AAP to deliver a redevelopment which is sustainable and landscape-led. The site has potential to deliver housing, but is also heavily constrained by contamination (the level is

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

unknown), funding, and topography. The Consultancy explained that there would need to be open-mindedness about a range of uses and a larger quantum of development. It appeared to the Consultancy that the landowner has not been involved in the AAP. All the above raised questions about achievability and deliverability of development. The Consultancy believed that a housing led scheme would be the most likely viable option, and so suggested that the quantum and density of development could be increased to; ensure the delivery of affordable housing; and help make this major development acceptable in a National Park. In addition, the Consultancy believed that the site's remoteness from nearby settlements means that increased public transport provision – along with electric car hire, shuttle buses to the railway station, and connection to cycling network – would be essential to ensure future residents are not reliant on the private car. The Consultancy questioned lower density development and the demolition of all existing buildings, and suggested that higher densities (i.e. flats or townhouses) could yield more revenue per hectare, and that the existing buildings would have a large amount of embodied carbon. Finally, the Consultancy commented that the Riverside should functionally connect with the rest of the site, and residential amenity is likely to be a concern given the limited daylight/sunlight and outlook due to topography and ground contamination.

The **National Trust** welcomed the opportunity to comment and stated that, as owners of the land north of the site, they object “in principle” to the land-use options due to the highly sensitive characteristics of the Bowl, the Clifflands, and the MoonSPACE. The Trust proposed that the above areas remain largely undeveloped, and that the greatest level of change is proposed at the Cement Works and Riverside. The Preferred Option should identify opportunities for access and biodiversity links.

Individuals

There were multiple responses which overlapped across Q26-28. A number of individuals either combined their answers to Q26-28 in a response to one of the questions, or replicated the same answer for all three questions. In order to ensure that responses and public opinion have been captured correctly (as much as possible), the individual responses have been appropriately split up / divided across Q26-28. A summary of the responses to Q27 is below.

There were 6 individuals who wanted to see progress on the redevelopment of the site and raised dissatisfaction with slow progress to date. Conversely, there were 8 individuals who did not want to see the site redeveloped and, instead, wanted to see its decline managed for nature recovery, rewilding, and education. In addition, a further individual commented that it was now too late to do anything, whilst another individual expressed opposition to all proposed scenarios. Individuals also asked about whether the landowner was part of the AAP and, if not, then what their alternative proposal was. There were also comments in relation to making the landowner rectify the damage done to the environment to date.

Notwithstanding the above, the majority of responses received in relation to Question 27 broadly mirrored those of previous chapters and questions. The responses referred to the unique characteristics of, and the innovative and sustainable opportunities for, the site. The above also included suggestions for; the improvement of, and connection to, existing walking and cycling routes (incl. Downs Link and South Downs Way) [5 individuals]; the maximisation of biodiversity net gain (BNG), habitat connection, nature recovery, wildlife, and soil and water improvements [5 individuals]; the creation of public access to the site and riverside [3 individuals]; the conservation of heritage and local history [3 individuals]; promotion of arts and crafts [1 individual], and the delivery of an outdoor activity, leisure and learning complex [3 individuals], a museum [1 individual], a nature

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

park [1 individual]; a visitor centre [1 individual]; and a regional recycling/energy producing facility [1 individual].

In terms of the proposed developments options / scenarios, there was no overriding consensus about the mix and capacity (both maximisation and minimisation/limitation) for housing, employment and leisure related redevelopment. The quantum and location of development appears to be continually debated, although some individuals commented on the need to add value to the local economy, and the delivery of electric vehicle (EV) charging points and Passivhaus. Furthermore, individuals were concerned with the capacity of existing infrastructure in the local area and nearby settlements. More specifically, individuals were concerned with the capacities of dentists, GPs, roads, and schools, along with the reported discharges by Southern Water upstream. Indeed, individuals were concerned with pollution – i.e., existing pollution, along with pollution during and after construction – and suggested that the main road should be widened and straightened, and that sustainable travel options must be created.

There were a number of individuals who commented on the accuracy of some of the context and information included in the Draft AAP. This included the need for fact checks and reviews in relation to; the references in Sections 3 and 4 in relation to the Adur rather than Arun; the number of local bird species (112 vs 65); the siting of Common Sandpipers, Peregrines, and Ravens; the siting of Butterflies, Common Seals, and Weasels; and whether the site is called Beeding (rather than Shoreham) Cement Works. Finally, some individuals submitted examples of what the direction of travel / redevelopment could like. These examples included; Beddingham Landfill (and its return to natural downland); Bio Parc Zoo (Doue-La-Fontaine, France); and Poundbury (Dorset).

The consultation, itself, was commented on by individuals. There were 3 individuals who were pleased with the content and presentation of the consultation. However, another 4 individuals expressed dissatisfaction with the consultation due to it; being “dumbed down”; including constrained thinking and lack of vision; providing nothing for potential developers as a guide to countryside protection and sustainable development; and steering respondents to a “pro-development” answer. In terms of “constrained thinking”, 1 individual commented that the redevelopment needs to take an adaptable and flexible approach as “demand” and “need” will change over time.

Question 28: Based on the Issues and Options set out in this document, what are your three top priorities for the redevelopment of Shoreham Cement Works that should feature in the Preferred Option and why?

There were a total of 91 responses to this question. These are summarised below.

Parish and Town Councils

Findon Parish Council (FPC) commented that the top priorities for the redevelopment of SCW are; (1) enhancing biodiversity and nature; (2) maximising cultural heritage; and (3) the delivery of a self-sufficient community with appropriate infrastructure.

Upper Beeding Parish Council (UBPC) commented that the top three priorities for the redevelopment of SCW are; (1) a plan that meets the wishes and needs of the community, district councils, the National Park, and other agencies and departments; (2) joint working with other site

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

proposers to produce one agreed way forward; and (3) a plan that be agreed by the landowner, funded, and progressed.

Other Organisations

The **Adur Collective Community Land Trust (ACCLT)** believed that the three top priorities for the redevelopment of SCW are; (1) community led affordable housing; (2) frequent public transport links; and (3) beautiful design. The Trust explained that the above are because of the lack of local affordability, and the need to ensure that communities are designed around people and what people want, whilst minimising harm to the environment.

The **Greening Steyning Group** commented that the three top priorities are (1) biodiversity; (2) public transport; and (3) sustainability. The Group explained that the first is because the UK is one of the most nature depleted countries in the world, and the biodiversity crisis (which is intrinsically linked with the climate crisis) could lead to irrecoverable ecological collapse. The second is because of sustainability benefits and the need to reduce traffic on an already busy road. Finally, the third is because meeting our needs without comprising the ability of future generations is an essential and moral obligation.

The **Sussex Campaign to Protect Rural England (CPRE)** shared the ambitions for the redevelopment of SCW to be visionary and incorporate innovative landscape, architecture, and engineering design, along with enhanced public access. In addition, the Campaign expected the biodiversity and climate emergencies, environmental improvements, and soil health to gain greater salience on the SDNPA's ambitions. Notwithstanding the above, the Campaign believed that the options for redeveloping the site were incomplete (and many questions were, therefore, irrelevant) as consultants have not yet been able to access the site to understand the levels of asbestos, ecology, hazardous waste, and poisoned ground. As such, the CPRE believed that commenting on the AAP was premature.

The **Whaleback Planning Consultancy** commented that the top three priorities for the SCW redevelopment are; (1) financial viability (considering a range of uses); (2) affordable housing; and (3) sustainable transport links to nearby towns and employment opportunities.

The **SDNPA Design Team** believed that the top three priorities are; (1) exemplary sustainable performance; (2) landscape-led design; and (3) accessibility and inclusivity.

Individuals

There were multiple responses which overlapped across Q26-28. A number of individuals either combined their answers to Q26-28 in a response to one of the questions, or replicated the same answer for all three questions. In order to ensure that responses and public opinion have been captured correctly (as much as possible), the individual responses have been appropriately split up / divided across Q26-28. A summary of the responses to Q28 is below.

Overall, individuals commented that the top priority for the Preferred Option should be the conservation and enhancement of the environment [34 individuals]. These individuals highlighted the need for the future of the site to link with the purposes and duty of the National Park by contributing to biodiversity net gain (BNG), habitat restoration, nature recovery, and scenic beauty. Notwithstanding the above, there were an additional 2 individuals who would like the site to be returned to its previous non-developed state and left alone to re-wild, whilst a further 2 individuals

Shoreham Cement Works Area Action Plan Issues & Options

Summary of Responses

simply commented on the need to carry out tree planting. As part of the above, comments in relation to the setting, and the views in and out, of the National Park were also recorded.

The joint second highest priorities related to the delivery of infrastructure [16 individuals] and the delivery of a sustainable, green and carbon neutral development [16 individuals]. In terms of the delivery of infrastructure for new and existing communities, the need to reduce traffic congestion and improve access, egress and sustainable public transport options were the most frequent answers. However, individuals also alluded to digital, parking, rail, schools, shops, and water infrastructures. In addition, a further 8 individuals commented on the need for the redevelopment to link up to, and enhance, existing walking and cycling routes – including the Downs Link and South Downs Way (SDW). As for the delivery of a sustainable, green and carbon neutral development, individuals wished to see an attractive and high quality design for development, along with “sustainable living” and renewable energy generation.

The third top priority included the delivery of outdoor leisure and recreation activities and facilities, for the health and wellbeing of both residents and visitors [12 individuals]. The specific suggestions broadly aligned with those captured under Chapter 5H. However, for the avoidance of doubt, the suggestions submitted under Question 28 included; public access to downland and river [4 individuals]; sufficient open/green space [3 individuals]; a visitor centre and café [2 individuals], a hotel [1 individual], and an amphitheatre in the Bowl [1 individual]. In fourth place on the priority list was the need to conserve and enhance cultural heritage and local history [9 individuals]; however, conversely, 4 individuals wanted to see the complete removal of all industrial buildings.

There were 4 individuals who answered that there were no options or priorities that they agreed with; whilst 2 individuals set out their preference for Option 2 (mixed use employment and housing), and another 9 individuals believed that a sustainable mix of uses (i.e. housing, employment, and leisure) on site should be prioritised. In addition, 6 and 2 individuals commented that the priority should be on “a place to live” and a “place to work” respectively. Notwithstanding the above, there was debate over the correct mix, density and priority of development. For example; 9 individuals favoured a housing led scheme (with affordable and community owned housing); 8 individuals wanted to see no or very limited housing and employment uses; 7 individuals wanted to see a mix of sustainable, low density, housing; and 4 individuals favoured local and small scale businesses with some connections to the green industry.

Moreover, individuals commented on the need to create a modern, exemplar and sustainable community which is technically feasible, financially viable, and creates a new landmark and place. As part of this, the Preferred Option must not negatively impact existing residents in terms of contamination, noise, pollution and traffic. To do this, individuals commented that the SCW redevelopment should be linked to a larger plan that involves Shoreham Airport and the River Adur Valley, and that the Preferred Option must be agreed by all landowners, local authorities, and other agencies and departments operating in the local area.