

**Shoreham Cement Works Area Action Plan Issues & Options Consultation  
Adur District Council**

Area Action Plan	
Consultation Question	Officer Response
<b>Question 1: How could the redevelopment of Shoreham Cement Works contribute to the purposes and duty of the National Park?</b>	<p>Adur District Council (ADC) supports the principle of an AAP being progressed for Shoreham Cement Works and welcomes the opportunity to comment on the Issues and Options consultation document. ADC is supportive of the aspiration for an exemplar mixed use development of this site that will conserve and enhance the landscape and scenic beauty of the South Downs National Park as well as conserving the cultural heritage / legacy of Shoreham Cement Works.</p> <p>Adur District Council has a particular interest in the area labelled as 'Riverside' as this falls within the jurisdiction of Adur District Council although ADC is not the responsible Planning Authority for this area.</p>
<b>Question 2: What three words do you associate most with Shoreham Cement Works?</b>	(1) opportunity (2) under-utilised and (3) mixed-use
<b>Question 3: Should development be restricted to previously developed areas?</b>	The Council supports the principle of utilising previously developed land which relates to the areas classed as 'Riverside' and 'Cement Works'. The Council acknowledges the viability cost implications associated with bringing forward development on a brownfield site of this scale especially to address satisfactory remediation requirements. Whilst the Council recognises that the option of

	<p>redeveloping the Riverside would yield the most profitable area to build homes, the Council does have some comments concerning landscape and flooding / flood risk and these are made in response to Question 8 and Question 14 respectively.</p> <p>With regards to the area classed as 'The Bowl' (greenfield) it is noted that the Issues and Options document identifies the potential to build lightweight commercial buildings that could be accommodated on the contaminated land area that would generate value for the site. In addition, it is noted that The Bowl along with the greenfield area classed as 'The Moonscape', provides an opportunity for recreation and tourism such as zip lines, mountain biking or toboggans that could be fairly hidden inside the wider landscape. Should these development options be developed further, the Council would wish to ensure that such proposed uses will not result in the introduction of new structures that could be visually harmful to the setting of the National Park and that any future proposals include an assessment of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</p> <p>The Council supports the design principle that the areas classed as 'The Clifflands' shall remain largely undeveloped. However, it is noted within the opportunities section in paragraph 4.25 that there is an opportunity to highlight the sensitivity and value of this area for educational purposes. Whilst it is recognised that this is an Issues and Options Stage, should the concept of education be developed further, the Council would encourage clarification on what this entails i.e. educational walking trails or involves building for an educational use such as a visitors centre.</p>
<p><b>Question 4: Would you like to see materials on site re-used or re-cycled for construction?</b></p>	<p>Adur District Council has declared a climate emergency and thus recognises the importance of operating within a circular economy model by way of reducing embodied carbon impacts from</p>

	<p>development.</p> <p>If existing buildings can be retained, development should seek to retrofit energy and carbon reduction measures (where feasible) rather than demolish and re-build them. It is also possible to minimise the use of resources through reducing waste, minimising materials required, and using materials with a low embodied carbon content. This could be achieved by focusing on the sustainable (re)use of existing materials as far as possible before considering introducing new materials.</p> <p>However, it is acknowledged that some existing buildings on the site have contamination issues as well as asbestos-cement cladding walls being present. It is understood that there is a potential demolition risk associated with the extent/thickness of slabs and foundations. Whilst the Council is generally supportive of the principle of the re-use and recycling of existing materials, it is understood that there are exceptional circumstances surrounding this site with contamination issues needing to be addressed, and therefore the reuse or recycling of materials will not be possible across all parts of the site.</p>
<p><b>Question 5: How far do you think the new buildings should reflect the height and massing of the existing buildings?</b></p>	<p>The Council takes the view that the redevelopment of Shoreham Cement Works could be informed by Design Codes. Given the high landscape sensitivities and the need to conserve and enhance the landscape beauty of the National Park, it is considered appropriate to set out Design Codes that are sympathetic to local character and cultural history of the Shoreham Cement Works, including the surrounding built environment and landscape setting. This is a vital evidence base document to guide future redevelopment at this site. Paragraph 126 of the NPPF is clear in that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development,</p>

	<p>creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. This would be an opportunity for effective engagement between applicants, communities, local planning authorities and other interests throughout the process.</p>
<p><b>Question 6: Would you prefer a contemporary or traditional approach to architectural design or a mixture of both?</b></p>	<p>See response for Q.5</p>
<p><b>Question 7: What type of public space, such as public squares, pocket parks and skateboard parks, would you like to see and why?</b></p>	<p>A variety of public open space typologies are encouraged to meet the needs of residents and visitors, and could be addressed through the design code process referred to above.</p> <p>For information, Adur District Council updated its <a href="#">Public Open Space Study</a> in 2019. It is important to balance redeveloped areas with the needs for residents by providing place-based opportunities to improve the quality of life (e.g. recreational activities).</p>
<p><b>Question 8: Should the redevelopment hide, frame or reveal new views moving eastwards away from the main road or a combination of all three?</b></p>	<p>The Council has reviewed the Shoreham Cement Works Local Landscape Character and Sensitivity Study (May 2022). It is recognised that the Shoreham Cement Works forms a prominent position within the South Downs, and is located at the narrowest point of the SDNP.</p> <p>The Council accepts that any new development is likely to generate a fairly widespread direct and indirect effect on the landscape including views, ecology, perceptual qualities for, for example increased traffic. However, this harm would have to be outweighed by demonstrating that redevelopment of the site is in the public interest in accordance with paragraph 177 of the NPPF.</p> <p>Of particular interest is the Local Landscape Character Area (LLAC) 1a. Shoreham Cement Works West of A283 (which is also the area</p>

	<p>referred to as 'The Riverside') as this falls within Adur District. LLAC 1.a is a topographically flat landscape, with areas that have been artificially raised in the site, adjacent to the River Adur and its meandering corridor.</p> <p>The Landscape Sensitivity Evaluation indicates that there is a sensitivity value scoring of moderate-high against the Views &amp; Visual Amenity criteria. Buildings within the LLCA form middle-ground features within slightly elevated views across the valley from the west and within certain views from the quarry itself, from the east. They are also highly visible within shorter views from the A283 and users of the Downs Link and Public Rights of Way along the River Adur, between breaks in the surrounding vegetation. However, vegetation surrounding the area means intervisibility between the LLCA and the wider floodplain landscape is somewhat limited. The overall sensitivity for LLAC 1.a has been scored as Low-Moderate. It is understood that although the LLCA inhabits a prominent location along the course of the River Adur within the South Downs National Park, the poor condition of the landscape and its accompanying elements, and the evident highly developed and urban/ industrial character, means the area is afforded an overall low-moderate sensitivity. Therefore LLCA 1.a is of low-moderate sensitivity, to mixed used development.</p> <p>Despite that the Riverside (LLAC 1.a) has been identified as the most visually exposed part of Shoreham Cement Works, this area is considered most suitable for a residential use and this is the most viable land use but remains the least sensitive ecologically.</p> <p>The Council would want to ensure that redevelopment at this location (LLAC 1.a) is not visually intrusive (particularly when viewed from the river) and thus does not significantly have any detrimental effect on the environment, landscape and recreational opportunities. The Council is particularly supportive of the following LLAC 1.a design principles as set out in the Landscape Report:</p>
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	<ul style="list-style-type: none"> <li>• Respond to both sensitive views and character (built form is uncharacteristic in the floodplain) to design unobtrusive buildings and rooflines. Variety in the built form and visual breaks in the roofscape would be appropriate.</li> </ul> <p>Any new development in the LLCA should be particularly cognisant of visibility into the LLCA and views across the River Adur Valley and sensitive skylines.</p> <ul style="list-style-type: none"> <li>• The scale of any new development should not exceed the scale of existing development in the site, seen in views across the Adur Valley.</li> <li>• Keep new development heights below the horizon line of Beeding Hill and no greater than existing.</li> <li>• Design of buildings should be unobtrusive in views from the west, and work in partnership with other elements of landscape e.g. trees.</li> </ul>
<p><b>Question 9: Should any of the buildings, such as the chimney, be retained on site?</b></p>	<p>It is recognised that the chimney forms a cultural landmark signifying the historical land use context of the site. The Council does not have any specific policy comments regarding the possible retention of the chimney but would like to point out that the Council takes a positive approach towards the use of public art being incorporated within new major developments by way of improving the quality of the built environment and public realm. It is considered that perhaps the chimney could be treated as a form of public art to form a cultural link between the development and its industrial legacy.</p>
<p><b>Question 10: To what extent should the design of the redevelopment reflect the site's industrial past?</b></p>	<p>The Council would be supportive of a high quality design that sensitively characterises the site's unique industrial past .</p> <p>The NPPF is clear that the conservation and enhancement of cultural heritage are important considerations and should be given great</p>

	weight in National Parks.
<p><b>Question 11: In which area(s) of the site should the focus be for biodiversity protection, enhancement and creation?</b></p>	<p>The Council is committed to driving action on addressing the Biodiversity and Ecological Emergency.</p> <p>It is noted from the Issues and Options Consultation document that the biodiversity evidence indicates that the area classed as The Riverside is the area with the least high value habitat and therefore has the most potential for accommodating development. It is understood that the five areas of the site offer different opportunities for nature recovery, for example, the Riverside could be conserved and enhanced as a riparian corridor linking with other habitats down and up stream. The Shoreham Cement Works Local Landscape Character and Sensitivity Study (May 2022) identifies the following design principles which the Council strongly supports:</p> <p>This area hosts an important opportunity for the delivery of green and blue infrastructure in a manner that will not only deliver a host of ecosystem services but that also have a positive impact on character and people.</p> <ul style="list-style-type: none"> <li>● A network of GI should join up existing habitats within the site and its boundaries. Opportunities to connect ecologically sensitive areas should be maximised: from the river to the eastern end of the quarry.</li> <li>● Blue infrastructure should be designed following the existing contours of the site and maximise opportunities to connect the site with the River Adur.</li> </ul> <p>The Council would welcome the opportunity to explore the wider connectivity and ‘joining up’ of a nature recovery network such as utilising the riparian corridor along the River Adur. A Green Infrastructure Strategy is being produced by the Council (which will comprise of a strategy, action plan and a supplementary</p>

	<p>planning document) and when in place, developments will be expected to comply with it. All developments (excluding householder applications) will need to demonstrate how they will contribute to the implementation of the Green Infrastructure Strategy both at site level and with regard to the wider green infrastructure network. The Green Infrastructure study and Local Nature Recovery Strategy will be reflected in the update of the Adur Local Plan.</p> <p>Adur District Council is one of 27 landowners involved in a recent Landscape Recovery bid, which if successful would create a largely connected 766 hectares of new habitat and river restoration, stretching from the Knepp Rewilding Project down to Shoreham where it meets the Sussex Bay restoration of the sea beds and kelp forests along the Sussex Coast. The vision for the Adur River Landscape Recovery bid is to see a healthy river Adur, connected to its floodplain with thriving ecosystems and habitats running through a wildlife-friendly farmed landscape that supports life and provides biodiversity, carbon storage, and natural flood management for Bramber, Beeding and Shoreham. (This is part of the much larger nature corridor being proposed called Weald to Waves. <a href="https://www.wealdtowaves.co.uk/">https://www.wealdtowaves.co.uk/</a>)</p> <p>This stretch of the Adur river will be an important part of this project and the potential for new and restored habitats in the Riverside location should not be underestimated. It is understood that the South Downs National Park Authority is aware of the Landscape Recovery Bid. It would be useful to explore the Building with Nature Standards for future development proposals at the cement works.</p>
<p><b>Question 12: Should buildings and structures contribute to nature via green roofs and walls or should these surfaces support solar energy or a mixture?</b></p>	<p>Well-designed and maintained solar panels and green roofs can coexist, providing both essential biodiversity and renewable energy opportunities. Evidence suggests that green roofs help to cool the solar PV panels, which improves the efficiency of the panels. Rain gardens and other SuDS can also provide essential sustainable</p>

	drainage and increased biodiversity opportunities.
<p><b>Question 13: What renewable energy generation do you think the site could offer?</b></p>	<p>The site may offer a range of opportunities for renewable energy generation. In addition to rooftop solar power (either electricity generation from solar photovoltaic or solar thermal hot water systems) there may be opportunities for ground source or water source heat pumps to deliver space heating and hot water. The impacts of any such system on the chalk aquifer and/or the River Adur would need to be considered.</p>
<p><b>Question 14: What opportunities do you think there are for the design of the redevelopment to ensure resilience to climate change?</b></p>	<p><b><u>Flooding</u></b></p> <p>The area labelled as 'Riverside' falls within the jurisdiction of Adur District Council. We note from Section 5c that with climate change allowances, Flood Zone 3 is expected to encroach onto the southern part of Riverside and this may also affect the access road. We recommend better integration or cross reference between the climate change and flooding sections.</p> <p>Section 5.39 states that highly vulnerable development including basement dwellings and temporary dwellings is considered appropriate within all parts of the site with regards to flood risk. However, this conflicts with Table 3 of the Planning Practice Guidance which states that highly vulnerable development is inappropriate in Flood Zone 3 and that the exceptions test is required for <i>more</i> vulnerable development to be located in Flood Zone 3.</p> <p>The NPPF (paragraph 159) states that development should be directed away from areas at highest risk of flooding, whether existing or future. The AAP should be clear how the sequential approach will be adopted across the site to ensure the most vulnerable uses are directed away from areas at high risk of flooding. This should include future flood risk across the lifetime of the development and flooding from all sources.</p>

	<p>The Strategic Flood Risk Assessment particularly the findings of the Level 2 assessment of the site includes information on flood risk and policy recommendations. This could be better referred to in the AAP, as could maximising the multifunctional benefits of SuDS for biodiversity net gain, green infrastructure and an overall reduction in flood risk.</p> <p>Given recent climate change allowances, it may be beneficial to undertake a Level 2 update of the SFRA, particularly for this specific site.</p> <p><b>The following Comments have been made by the Council's Engineers Team:</b></p> <p><u>Flood risk comments</u> Areas of the "riverside area" are shown to be at risk from tidal flooding in the future when considering climate change. The statement that this area of development is suitable for all vulnerability uses is contrary to policy.</p> <p>The drainage and flood risk assessment could be better reflected within the summary document.</p> <p>The main area action plan document makes no reference to surface water flood risk, which is present within this site. There is a surface water flow path shown within the "riverside area", this may indicate the presence of a watercourse here. All sources of flood risk should be considered to ensure development is safe and does not increase flood risk. Updated climate change allowances for pluvial flooding should be used when evaluating this site.</p> <p>The quality of the existing river embankment defence is unknown however based upon knowledge of embankments elsewhere along</p>
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the River Adur it may not meet modern design standards and may be at a greater risk of failure. Reliance upon the existing defence should be discussed with the Environment Agency.

River environment comments

As detailed above reliance shouldn't be placed upon the river defences being located in their current positions for the duration of development. The Adur catchment flood management plan policy for this area is to "take action with others to store water or manage run-off in locations that provide overall flood risk reduction or environmental benefits". It is likely that opportunities will be pursued, during the development lifetime, up and downstream of this area to remove defences or move these further back.

The river environment is sensitive and the potential introduction of more people to this environment should be carefully considered and managed to try to reduce any negative impacts.

Surface water drainage general comments

Surface water drainage must be considered at the earliest stage of proposals, with spatial planning considering natural topography, existing flow paths and space required for sustainable drainage.

The hierarchy for sustainable drainage must be followed with infiltration fully investigated. Winter infiltration testing and winter groundwater monitoring must be undertaken, it is advised that the applicant/authority discusses the extent of this monitoring with us at the earliest opportunity. Infiltration tests must be carried out in accordance with BRE365. Infiltration systems must cater for the 1 in 10 year storm event plus 45% on stored volumes, between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year storm event plus 45% on stored volumes, as an allowance for climate change.

	<p>Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location.</p> <p>If on-site infiltration is not possible, drainage via a restricted discharge to a suitable local watercourse may be acceptable. Any discharge should be restricted to the mean QBAR greenfield run-off rates for all design storm events. This rate is derived from only the impermeable area of the development, including any permeable areas that are positively drained. A minimum allowable rate of 2 l/s is generally considered to avoid blockage risk of flow control devices, however, lesser rates can be achieved if adequate blockage prevention measures are incorporated.</p> <p>We suggest that, at the earliest stage, the developer/authority gives due consideration to the appropriate location and design of surface water drainage features to achieve necessary capacity, water quality (via the SuDS management/treatment train), as well as ease of on-going maintenance. Surface water drainage features should also be designed in a manner that positively affects the amenity of the site. We would like to remind the developer that, open features, such as swales, basins and ponds, when designed correctly, can satisfy all the above aspirations in addition to; being easier to maintain, having longer lifespans and offering ecological advantages over subterranean features such as “plastic crate systems”.</p> <p>It should also be noted that attenuation features should not be counted within usable public open space provision. Existing and proposed trees (root protection zones) must not conflict with suds features/pipework.</p> <p>Ground raising is discouraged. If it is considered absolutely necessary, then due consideration must be given to the potential impacts on existing properties adjacent the development site, in terms</p>
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of possible elevated groundwater levels and surface water run-off implications.

Surface water drainage specific comments

The drainage and flood risk statement identifies that it is considered likely that the existing developed area of the site is served by positive drainage to a number of outfalls to existing ordinary watercourses and the River Adur. We agree that areas C and D should be considered as greenfield for surface water drainage design purposes.

The strategy considers an option of only delivering 30% betterment over existing flows; this does not comply with the adopted WSCC policy for the management of surface water. The strategy only considers a 20% climate change allowance, this also does not comply with policy. Upper end allowances must be used and be suitable to the lifetime of development, therefore in this area we require a 45% allowance for climate change to be used.

FEH 2013 data should be used with an appropriate value of Cv selected for drainage calculations.

Area A/ the riverside is at a relatively low elevation, any proposals to discharge to the River Adur must consider surcharging of the outfalls. With the following events considered as a minimum:

- a) a 30 year climate change rainfall event combined with a 2121 MHWS tide, to demonstrate no flooding;
- b) a 100 year climate change rainfall event combined with a 2121 MHWS tide, to demonstrate flooding on site is safely managed and does not increase flood risk elsewhere; and
- c) a 2 year climate change rainfall event combined with a 2121 200 year tide, to demonstrate flooding on site is safely managed and does not increase flood risk elsewhere.

	<p>We would recommend consideration of any opportunities to provide drainage "over the wall" to remove this tidal locking. Area A could discharge unattenuated if it is demonstrated that scenarios a-c above are met and other statutory consultees are in agreement with this. Full treatment of surface water prior to discharge would still be required.</p> <p>Any proposals to discharge to ordinary watercourse must also consider surcharging of outfalls, with surcharged water levels set to adjacent top of bank level where modelled data for predicted water levels is not available. Discharge to ordinary watercourse would have to be restricted and meet policy requirements, i.e. as close to greenfield QBar as possible for all events up to and including the 1 in 100 year plus 45% climate change event. Ordinary watercourse land drainage consent would be required in support of any proposals to discharge to ordinary watercourse.</p> <p>Please note that pumping of surface water is not accepted.</p>
<p><b>Question 15: What is your view on a new roundabout or any other solutions to access the site?</b>  <a href="https://www.southdowns.gov.uk/wp-content/uploads/2022/06/Section-5G-Getting-Around.pdf">https://www.southdowns.gov.uk/wp-content/uploads/2022/06/Section-5G-Getting-Around.pdf</a></p>	<p>The Council notes the reference in paragraph 5.86 that 'transport tensions on the surrounding network can be mitigated', and that paragraph 5.88 states that all development scenarios require significant highway improvement measures together with reductions in private car usage. The Council is keen to ensure there are no adverse impacts in the road network within Adur District or the vicinity, including the A27 and would welcome further liaison with the National Park and Highway Authority on this matter.</p> <p>We note that the accompanying transport study considers improvements on nearby junctions, including the A27/ Lancing roundabout. It will be important for the Council to understand how any mitigations will be implemented, phased and funded; this is particularly important given that Adur District Council will shortly be commissioning a transport study to support the forthcoming update</p>

	<p>of the Adur Local Plan, and would welcome continued liaison with the SDNPA on this matter. Similarly, the Council would welcome an understanding of whether funding of sustainable transport measures elsewhere in Adur is likely to arise from the proposed development. Given the reference to necessary mitigation works on surrounding junctions/ roundabouts in the AAP - perhaps these improvements could be detailed (or at least cross-referenced) in this document for clarity?</p> <p><b><u>Active Travel</u></b></p> <p>Given the need to reduce private car usage, active travel measures will be particularly important. The Shoreham Cement Works Local Landscape Character and Sensitivity Study (May 2022) identifies the following design principles which the Council strongly supports:</p> <ul style="list-style-type: none"><li>• Active travel facilities incorporated into any new mixed-use development within the site and links to the wider active travel network should be provided.</li></ul> <p>This is particularly important given the location of the site away from any existing services and facilities.</p> <p>The Council supports this approach and notes the reference in paragraph 5.87 regarding improvements to sustainable access to the South Downs Way and Downs Link. Adur &amp; Worthing Councils have published a Joint <a href="#">Local Cycling &amp; Walking Infrastructure Plan</a> (LCWIP) which seeks to increase the uptake of cycling and walking by identifying preferred routes and core zones for further development; and a prioritised programme of infrastructure improvements. The LCWIP includes Primary Cycle Route 330 Downs Link (Steyping-Shoreham).</p> <p>Paragraph 5.88 refers to the need to reduce private car usage; the</p>
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	<p>location of a car club facility at the site should be considered.</p> <p>Paragraph 5.94 states that the roundabout would involve ‘regrading of terrain’. It is not clear what the impacts of this would be, given the visually exposed nature of this character area. The landscape impacts of this should be fully clarified and assessed. See response to Question 8.</p>
<b>Question 16: Do you support shared surfaces or segregated routes for vehicular traffic and pedestrians/cyclists for parts of the redeveloped site?</b>	These could form a useful part of an integrated movement strategy and should be integrated into the design from an early stage.
<b>Question 17: What visitor attractions would you like to see on the site?</b>	No comments
<b>Question 18: What visitor attractions would you not like to see on the site?</b>	No comments
<b>Question 19: What do you think is special about this part of the National Park that could attract visitors and can you suggest how it could be enhanced as part of the redevelopment?</b>	<p>This part of the National Park is where the Downland meets the River Adur. The Adur River Landscape Recovery project has the potential to see a healthy river Adur, connected to its floodplain with thriving ecosystems and habitats running through a wildlife-friendly farmed landscape that supports life and provides biodiversity, carbon storage, and natural flood management for Bramber, Beeding and Shoreham. The Riverside site might provide eco-tourism opportunities for visitors looking to connect with the river and Downland, with opportunities for habitat interpretation boards, bird hides and other wildlife viewing points, or a visitor centre and cafe. However, the current proposals set out in the Area Action Plan could potentially conflict with the Landscape Recovery Project, and further discussion is welcomed.</p>
<b>Question 20: Who do you think would be interested in living at the redeveloped Shoreham Cement Works?</b>	No comments
<b>Question 21: What do you think would help make this a</b>	No comments

<p><b>sustainable community where people would like to live?</b></p>	
<p><b>Question 22: Do you think houses with gardens or flats or a mixture should be built?</b></p>	<p>The Council acknowledges paragraph 2.9 of the Issues and Options document which recognises the many interdependencies and connections that exist across the boundary, including the unmet housing need to both the south and north in Adur and Horsham Districts outside the National Park. The National Park will be aware of the significant constraints to growth experienced by Adur DC.</p> <p>A Statement of Common Ground was agreed between Adur District Council, Worthing Borough Council and the South Downs National Park in March 2018 which indicates that given the role and functions of the National Park, it is not in a position to meet unmet housing needs of other local authorities. As a general principle, new residential development should incorporate a range of dwelling types, tenures and sizes including the provision of affordable housing. Development in the AAP area should take account of identified housing needs.</p> <p>The Adur Strategic Housing Market Assessment published in 2020 sets out the needs for various type and tenures in Adur and identifies an annual need for 309 affordable homes in Adur. <a href="https://www.adur-worthing.gov.uk/media/Media,157227,smxx.pdf">https://www.adur-worthing.gov.uk/media/Media,157227,smxx.pdf</a></p> <p>It is acknowledged that the location of the site may not make it appropriate for all forms of affordable housing, as it lacks services and facilities. In addition, the viability issues affecting the site may result in a reduced ability to provide affordable homes. However, there may be an opportunity for some tenures described as affordable in planning policy terms (First Homes or shared ownership) to be delivered on this site. This should be reflected within the AAP.</p>
<p><b>Question 23: What sort of businesses would you like to see and</b></p>	<p>As a general point the site should of course be seen in the strategic</p>

<p><b>why?</b></p>	<p>context of employment uses that may come forward in the wider area, including at Shoreham Airport and the former IKEA site within Adur.</p> <p>An updated Adur Employment Land Review Study is to be commissioned as part of the evidence base for the emerging Adur Local Plan update. This will provide evidence as to employment needs within the local area.</p> <p>However the Council would also suggest there is a particular opportunity to link to ongoing work around the Adur Estuary/ Sussex Bay and make provision for ecological, horticultural, and/ or green technologies.</p>
<p><b>Question 24: What sort of businesses would you not like to see and why?</b></p>	<p>No comments</p>
<p><b>Question 25: Do you think green tech companies should be encouraged to locate here?</b></p>	<p>It is necessary to view this site in a strategic context against employment uses that may come forward at the Airport and on the former IKEA site, however in principle, yes. The Council is seeking to encourage a green economy and green tech companies in this location would assist the overall ambition.</p>
<p><b>Question 26: Are there any particular ideas, issues or policies you would like to see in the AAP?</b></p>	<p>The Council would welcome clarity on the approach to delivering Biodiversity Net Gain.</p> <p>There is an opportunity for the Area Action Plan to address the use of Design Codes.</p>
<p><b>Question 27: Have you got any other comments on Shoreham Cement Works?</b></p>	<p><b><u>Viability</u></b></p> <p>The BPS study initial testing found all development scenarios, with a policy compliant 50% affordable housing provision, to be in substantial deficit (making a loss). The scenarios were still in deficit with 100% private market housing with no affordable housing provision. Sensitivity analysis undertaken by BPS, shows a 'best</p>

case' scenario where Development Scenario 2 makes a surplus (is viable) and Development Scenario 1 is close to breaking even. Development Scenarios 1 and 2 include 400 and 240 homes respectively.

A number of options arising from the viability evidence:

- A 100% private market scheme to maximise viability
- A mixed tenure development with a small proportion of onsite affordable homes
- Development required to provide a financial contribution in-lieu of providing onsite affordable housing

The Council therefore notes the viability issues relating to this site.

#### **Environmental Health**

#### **The following Comments have been made by the Council's Environmental Protection Team:**

These comments concentrate on the stretch of the Cement works that falls within Adur.

Ground contamination in this area would have to be ascertained, the land is old chalk pits and may be infilled with unknown material. The site is currently used for storage of vehicles and other tanks which may be a source of contamination. Finally, there was a significant fire there some years back which will be a source of contamination. Given the land's location next to the River Adur (Controlled Waters) the Environment Agency will need to be consulted on any development and proposed land remediation in this area.

With any development Environmental Health would look at the potential health impacts this could have on the locality. For example increased traffic movements affecting air quality. Consideration here

	<p>should be given to both the development stage and the end use.</p> <p>Given the location, in the National Park, consideration should be given to any lighting that will be part of the development to ensure that it is sympathetic to the environment.</p> <p>Noise will be a consideration during any demolition and construction phase of the development. Also noise from the existing road affecting any new residential development.</p> <p>From our records that development of this site has been previously looked at and thus the Council anticipates that conclusions in this former report may still be relevant today.</p>
<p><b>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?</b></p>	<p>No comments</p>

Sustainability Appraisal	
Chapter	Officer Response
Chapter 1 - Introduction	No comments
Chapter 2 - Scope of the SA	No comments
Chapter 3 - AAP Issues & Options Document	<p>Para 3.19 states that the water drainage and flooding theme highlights that the riverside area is likely to be suitable for housing. This is surprising given that this area is at risk of surface water flooding and the southern section is also identified as being at a high</p>

	<p>risk of tidal flooding in the future with climate change. It is unclear how this accords with the sequential approach set out in the NPPF of directing most vulnerable development to areas of lowest flood risk.</p> <p>Although the option of directing development to undeveloped or previously developed parts of the site was tested, it is surprising that directing residential development to each of the site areas was not tested as an option as part of the SA, as was done for which areas should the focus be for biodiversity. This would have enabled the justification for and potential impacts of directing residential development to the areas identified to be understood. As well as some of the competing demands for areas of the site.</p>
<b>Chapter 4 - The SA Findings at This Stage</b>	No comments
<b>Chapter 5 - Way Forward</b>	No comments

<b>Habitat Regulations Assessment</b>	
<b>Chapter</b>	<b>Officer Response</b>
<b>Chapter 1 - Introduction</b>	HRA is linked to the North Sussex water supply neutrality issue so no comments.
<b>Chapter 2 - Likely Significant Effects</b>	No comments
<b>Chapter 3 - Conclusion</b>	No comments