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CPRE Sussex - the countryside charity

The following constitutes CPRE's formal response to the 2022 consultation on the future options set out in the Area Action Plan (AAP) for the Shoreham Cement Works. CPRE welcomes this opportunity to contribute and acknowledges the, already, considerable effort put into the preparation of this AAP.

Although CPRE Sussex is sometimes seen as an organisation predominantly concerned with protecting the countryside and combatting inappropriate housing and infrastructure developments, we place great importance of responding to climate change, to ending the war on nature and recovering its diversity at our core. Our task must be to fight for that human health and well being so dependent on sustainable relationships between town and country and the rebalancing of humanity as part of nature. This perspective underlies our approach to the challenge of Shoreham Cement Works (SCW).

We recognise that that the inability to extensively survey the SCW leaves the SDNPA with serious problems given knowledge of the site being limited to drone footage and desk research and the levels of polluted and hazardous waste it contains unknown. This currently undermines the practicality of the available options. We feel that this limits the usefulness of CPRE's and other agencies responses to the consultation. We recognise that 'no development or doing nothing' is not an option and that the restoration of the site and even the extent of nature recovery and rewilding will be limited. We currently doubt that the options in the AAP constitute an effective vision on which to comment, rather they constitute 'kites flying'. We also note the lack of any financial 'envelope' related to providing a backdrop to the viability of any development proposals.

While the AAP contextualises the SCW in its spatial portrait, its setting so close two long distance paths, to Mill Hill and Five Ways, suggests that only by planning for the local catchment of the SCW, including its riparian corridor, as a whole (*possibly an area from the South Downs Way, Five Ways and Mill Hill, to the Adur riverside/Downs Link, from the river foot bridge back to the National Park's signage entrance at the A283 roadside sign from the A27*). Unless at least the area of the possible impact on any changes resulting from the the AAP proposals are modelled, good intentions will be undermined. (We note in Para 1.4 writing of the boundaries, only landscape and transport infrastructure are mentioned).

In response to the consultation questions posed:

1. The Cement Works with its graceless industrial buildings, creates a huge and very visible scar in the Downs and the National Park. It is bisected by the A283 road connecting the A27 and A24 which also challenges people crossing on the South Downs Way. It encroaches into the hillside only yards away from Mill Hill, a metalled bridle way constituting a major access point for walkers, cyclists, riders, dog walkers, taxis and cars approaching Five Ways and Truleigh Hill and its youth hostel as well as serving homes and farms. Currently, the need to cross the busy A283 prevents safe access for pedestrians, cyclists and horse riders onto the South Downs Way or from those on the Downs Link riverside path wishing to join the Downs eastwards. The Adur river valley provides several areas where roads and vehicular traffic threaten walkers and riders seeking to follow traditional bye ways and through routes.

While rewilding the cement works site, restoring poisoned ground and removing the worst examples of industrial heritage will be welcomed as closely relating to the authority's duties and purposes, contributing significant development of housing, business or leisure may only be seen as supporting those who only seek to monetise precious countryside for those with little other interest in the SDNP.

2. Opportunity, challenge, money pit.

3. This is no place for a new housing estate or development unconnected with the National Park. Arguably the most important challenges to all our futures is the rate of climate change, our continuing war on nature, the desperate need for nature recovery and increased biodiversity. This cleaned up space would enable the creation of a hub where through education, leadership and example, Park users and the public at large could better appreciate these challenges and

contribute more effectively to their and others' health and well-being. While presumably a key SDNPA resource and visitor centre, it offers a focus for studying the history of the flora and fauna, the settlement, farming and industries of the South Downs, it could provide a setting to show how to live with 'a lighter step on the earth', the circular economy and therefore a 'greener', less wasteful, fuller existence. Current routes to the sustainability of the SDNP should be an immediate rallying point.

4. All and every attempt must be made to decarbonise development which will potentially see materials reused, recycled, possibly conserved, alongside new materials and approaches.

5. While retaining the chimney may be a fitting memorial to its past role, other industrial buildings present little charm or design or heritage value. Their bulk and height deserve little account in any future buildings' design. On such a sensitive site, only buildings of high architectural quality are possible. The television programme 'Grand Designs' illustrates some examples of sensitive building in precious countryside. Recent work by the High Weald AONB creating colour charts and Pantones locally appropriate to its sense of place, may be helpful. Presumably the SDNPA's recent design guide will provide further assistance.

6. While there are many lessons from shockingly poor architecture everywhere, including domestic and business premises in and adjacent to the Park and the SCW, appropriate design sensitive to place and purpose should be the aim, allied to attracting a new audience to the wonders of our National Parks. To some extent, as well as constituting the largest development site in the SDNP, the SCW development will test any National Park's ability to develop industrial 'rural scars' close to urban settings with housing and other pressures. Indeed the national interest may be invoked and terms like 'iconic' may surface on such a key site.

7. The site must primarily be seen as a 'greened' site within the Park rather than a housing development site. This is not the place for a new village or hamlet nor an extension, however sympathetic, to the terrace of workers' and manager's housing adjacent to the site. Surely only rural style development with modern wooden picnic tables and benches on nature regenerated sites, will be the aim. In relation to leisure, we presume the emphasis will be on active rural leisure activities than sport facilities; skateboard parks, tennis and sports facilities would be inappropriate.

8. The starkness, sometimes majesty of chalk cliffs is often seen on the Downs where chalk has been extracted, as well as at the coast; elsewhere the drama of the sea's retreat from the land adds spectacle to the entrance to the Culfail Tunnel at Lewes. The height of the chalk walls at the SCW should be visible from the road, with, perhaps, the chimney retained to help with visual scale.

9. The chimney should be retained with all other buildings removed.

10. The SCW's past will always be hard to avoid and should be unnecessary in relation to architectural design. The industrial use of the Downs might be better reflected by resituating the Amberley Museum, or similar, with some additional artefacts and explanators on the site.

11. As far as possible, the whole site; restoring and improving biodiversity and soil quality is not something to 'tuck away' but a core purpose arguably more important to public interest than housing, hotels, retail and business convenience, and especially for the SDNPA.

12. The variety of orientations on the site offer significant opportunities for green renewable energy production and solar farms, especially the cliff faces. The Downs at this point attract considerable and strong westerly winds, so wind power might be annexed with innovative and sensitive design. A mixture of green roofs, walls and sustainable energy for the site and beyond should be an attractive goal.

13. See 12 above, the site requires a formal assessment of the potential opportunities.

14. The whole site's arrangement including the specification for all buildings and design standards should ensure resilience to climate change. Surely nothing else could be envisaged by the SDNPA.

15. Considering any particular changes to road infrastructure is inappropriate without some appreciation of road modelling, active travel and multimodal solutions using data sets and transport ambitions. A roundabout is not a solution to the need to consider how the A283 connecting the A27 and A24 needs to respond to a variety of demands for improvement and the need help diminish personal car journeys. West Sussex CC will need to review this road between the A27 and Beeding roundabout in the short term. Transport consultants have previously developed options for ingress and egress at the SCW, including over/under solutions, when former projects there emerged.

16. This discussion is premature and needs to relate to purpose, shared use should be a starting point.

17. Visitor attractions supporting the SDNPA's purpose and duties, responding to climate change, nature recovery, green solutions and outdoor country exercise and activities should predominate. Cultural attractions like the Eden Project, a mini Tate Gallery, out posted museum or outdoor theatre may also be appropriate.

18. CPRE believes that there is no obvious reason to consider zip lines, retail and business and other sporting or arena developments.

19. This part of the National Park sees a key cut through of the Downs by the River Adur. The valley's development since the 'Ice Age', is said to have produced considerable wealth in Mediaeval times. So the clearance of the Downs the recreation of the Adur valley's development in Roman and Norman times, Coombe's, Botolph's churches, the former Erringham chapel and long house, the area's war time experience and training camps, its ancient pilgrim and drover routes, even the old rail route to Guildford, offer many potential stimuli for considering the importance of this area historically and safeguarding its future.

20. Too many people would like to live in a redeveloped SCW with riverside views, particularly urban incomers and those seeking homes in a National Park close to major roads and Shoreham, but this is a precious rural site being reclaimed for nature. This should be neither a major housing development nor an enclave for wealthy residents. More appropriately it would be more appropriate to offer accommodation for Park visitors and users through wild camping, glamping to hostel and hotel facilities rather than permanent residents, possibly with rented accommodation for local workers. However multi modal approaches supporting alternatives to car use need to be a starting point.

21. CPRE does not prioritise a sustainable community other than for the visitors, workers and facilities there. It should not be an ambition to develop a 'sustainable' community if you mean by this, a new village, town or even neighbourhood. This should not be a major new housing development.

22. This is an inappropriate question; without much better knowledge of, and access to, the site any response comes down to personal prejudice. Why not a mini hospital, 'step down' convalescent beds and facilities for senior citizens or community groups or almost anything else if there is no vision?

23. Do you only mean commercial business rather than public services, if so why? Health related, cultural and green focussed organisations could become possible users

24. There are so many unattractive businesses, why not start with no estate agents, asset managers, financial services, or security firms?

25. Yes, as previously suggested Green Tech companies should have an important role and representation.

26. We would like to see this as a development addressing a ravaged area of the Downs rather than a splendid building site for retail and housing. Rather than a 'milch cow' for the site owners, these should only be compensated rather than rewarded for their previous management of the site and expected to contribute to the cost of removing any pollutants and hazardous waste for which they are responsible.

27. Just to reiterate, that as well as the wider social context for this site, the SCW needs to be seen by relating any AAP proposals to its local context and therefore develop a broader catchment and neighbourhood plan.

28. In his introduction to the AAP, Ian Phillips writes of opportunities for '*visionary development proposals*', '*incorporating innovative landscape, architecture and engineering design and enhanced public access*'. He recognises the the need to be '*financially viable*', addressing '*practical constraints*' producing '*solutions that will be imaginative, inspirational and deliverable*'. CPRE shares in all these ambitions but expects responding to the climate emergency and nature recovery, contributing to environmental improvement and soil health, to gain greater salience in the SDNPA's ambitions for the SCW.

However the AAP acknowledges that the Park's consultants have not yet had access to the site, so detailed knowledge of the levels of asbestos, poisoned ground, hazardous waste and ecology are severely limited. Realistic options for developing the site are currently incomplete and many Consultation questions therefore irrelevant. Unless there are plans for acquiring and developing this site, together with some outline costings and strategic investment options, commenting on this AAP is surely premature.

Please accept the above CPRE Sussex comments.

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