



# SUSSEX ORNITHOLOGICAL SOCIETY

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By e-mail only

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Dear Madam or Sir

## **Shoreham Cement Works Area Action Plan: Issues and Options Consultation**

*The Sussex Ornithological Society (SOS) is the county bird society for Sussex. We promote the recording, study, conservation and enjoyment of birds in the County, have over 2,000 members and a database of over 7 million records of birds in Sussex. More information about us can be found on our website at [www.sos.org.uk](http://www.sos.org.uk).*

### **Summary**

We wish to respond to the above consultation, because, as the published document recognises, Shoreham Cement Works is an excellent site for birds and for other wildlife.

We are concerned that the extent of development outlined in the AAP seems to be driven by the huge sum of money needed to make the site developable, yet because of the £26m cost of this, the most financially viable option, option 2, only shows a 0.4% surplus. These facts suggest an outcome in which none of these options are likely to go forward unless still more housing/industrial units are built on the site.

This being the case, we challenge the assumption underlying the published draft of the AAP that “doing nothing is not an option”, and that development of some kind is inevitable.

We realise that the SDNP Local Plan identifies the Shoreham Cement Works as a Strategic Development Site where the “landscape needs to be substantially enhanced” by removing the existing buildings. This, however, was a policy adopted three years ago in the SDNP Local Plan and we believe that, with the increasing recognition of the climate and bio-diversity emergencies and the need for much greater action to allow nature to recover, circumstances have changed substantially since then. Moreover, it is a policy which appears to us to be directly in opposition to NPPF Policy 177:

**177. *When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be***

*demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

We do not understand what the special circumstances are that require the SDNP to build up to 400 homes plus light industrial units, and to add tourist-destination recreation facilities and footfall, whilst arguably NOT enhancing the landscape, at least where views from the west bank of the R Adur or from high points on the Downs are concerned, let alone harming nature in the way this development will.

When the AAP says that £26m needs to be spent to allow development to go ahead, only £2.8m of that relates to the cost of demolishing the current buildings. Over £23m then needs to be spent to enable any development to occur – on costs to remediate the site so that it can be built upon, on building plant to treat the foul water from the developments that will be built on the site, and on changes to roads to handle extra traffic volumes and create a new entrance to the site. Were there to be no development and the site allowed to rewild it would appear to us that none of this £23m would need to be spent.

***We therefore would suggest that the SDNP develops a further option, which is to demolish the existing buildings, keep the site closed to visitors (but perhaps erect some viewing points of what will be an amazing view) and let the site rewild for the benefit of nature.***

We also question whether the options listed are the best way to improve the landscape (see 2 below) and we are also concerned that introducing a new population of residents plus day visitors to this site would significantly disturb wildlife, including birds.

**For these and the following detailed reasons, we object to the concept of redeveloping Shoreham Cement Works in the ways being considered.**

We have not responded directly to the questions posed in the AAP document, as our concerns relate more to the general principles behind these plans. However, some of the comments below do cover some of the issues raised in those questions.

### **1. Impact on birds**

Primarily, of course, the Society is concerned about the impact on birds. Despite severe degradation of the habitat by pressures from development, roads and recreational use, the lower Adur Valley remains of considerable importance for birds, and our view is that any further negative impacts must be avoided.

The site of the redundant works occupies part of OS mapping square TQ1908 and much of adjacent square TQ2008, the boundary between the squares running more or less along the line of the A283. We have a large number of records over the past 10 years (2012-2021) for TQ1908, which covers the western part of the site, the adjacent river, and the fields across the valley towards Coombes. 101 bird species have been recorded over that time, of which 21 are red-listed species of high conservation concern and 35 are amber-listed species of medium conservation concern. 14 of these species are also Schedule 1 species (as defined in the Wildlife and Countryside Act 1981), and 18 are Section 41 species (as defined in the Natural

Environment & Rural Communities Act 2006. These figures confirm the vital importance for birds of the Action Plan area and its immediate setting, which will, inevitably, be impacted by any substantial development.

In regard of TQ2008, covering the eastern part of the site, it is inevitable that we have far fewer records, as it is largely a closed area with little public access. However, we have records of 50 bird species using this area in the last 10 years (11 red-listed, 20 amber-listed, 7 of which are Schedule 1 species and 13 are Section 41 species). Many of these would be threatened by the proposed development and resulting disturbance.

Lists of the species recorded in these mapping squares are attached to this submission as appendices 1 and 2.

The importance of the site for breeding Peregrine Falcons is noted in the report, and their presence is supported by our data. Ravens have also nested in the works area during some of the last 10 years.

The chimney is used as a perch by the Peregrines. This species has a preference for locations containing such perches, locations used elsewhere including high blocks of flats, power station chimneys, and spires of cathedrals or monasteries. While they do not nest there at present, it may be that the chimney, or some replacement structure, could be adapted to offer a nesting site. This would be important if the existing nest site(s) become more accessible to the public and therefore prone to unintentional or unauthorised disturbance.

## **2. Visual Impact**

One of SDNP's stated objectives is to deliver an "Enhanced visual impact of the site from both the nearby and distant public viewpoints". We suggest that the best way to achieve this would be to demolish the existing buildings (with perhaps the iconic chimney and kilns left) and the site otherwise left to rewild. We do not feel that the vistas outlined in any of the 4 options, which would be a mix of housing, light industry, water works and recreational facilities, would be at all a positive improvement to the SDNP landscape. In particular, we point out that a view from the west bank of the River Adur of housing fronting onto the east bank would be seriously worse than the current sight of trees hiding the industrial area on the Riverside. Similarly views of a major development on both sides of the road from any high point on the Downs would surely be a much worse landscape vista than one of the current site re-wilded with most buildings demolished.

In particular SOS would be very strongly opposed to any plans for buildings along the river frontage (particularly three or four storey ones), and we would ideally want to see no built development between the river and the A283. Something like the Waterside development at Shoreham, with its "wall of glass" directly fronting the river should be ruled out and would be totally unacceptable.

In any event we would very much hope to see the existing barrier of uncontrolled vegetation between the Downs Link path and the river being retained or enhanced. Besides creating a green screen for birds using the river and the river valley generally, the eastern bank of the river is used by Common Sandpipers (amber listed species), which use the mud underneath the overhanging vegetation as a high-tide roost. Also, the branches over-hanging the river are used as hunting perches by Kingfishers (amber listed and schedule 1 species).

### **3. Cost of making the site suitable for development**

The CGL “Programme of Works Report for Land Contamination, Removal of existing buildings and drainage investigations” shows the following costs of making the site good so that it can be developed (Matrix 1):

Area	Riverside	Cement Works	Bowl	Moon-scape	Total
Demolition	£400K	£2,353K	£44K	None	£2,797K
Remediation	£2,250K to £5,390K		£7,130K to £7,370K *	None	£9,380K to £12,720K
Drainage, including new pumping station or WTW	£6,000K to £8,700K				£6,000K to £8,700K
<b>Total costs ex Transport Improvements</b>					<b>£18,177K to £24,217k</b>

\* the cost estimate for this could be up to £20.4M if used for residential development and if up to 600mm of top soil had to be removed. However, the £7m cost estimate is considered reasonable.

The Bowl was used as a waste site by Blue Circle and no one is really sure what lies beneath the top soil there. Remediation costs are therefore quite uncertain, and the estimate of £7.1m to £7.3m assumes no groundwater treatment will be necessary.

In addition to these on-site development costs, off-site there are “transport” costs to create a new site access roundabout on the A283 and upgrade junctions with roads in the vicinity to handle the extra volumes of traffic that the development would generate. These are costed at £2,451,552 (ADL Traffic Report April 2022, page 120, para 14.9.3) bringing the total costs of making the site developable to about £27m, with apparently much more risk that this cost could be higher rather than lower.

It can, therefore, be seen that the vast majority of the costs required to make the site developable relate to remediation costs (which are particularly uncertain), to installing new water treatment facilities to treat foul water from any of the development options and to improving road links to handle the resulting increases in traffic. It appears that none of these expenditures would be needed if there was no development on the site. The actual cost of just demolishing the buildings on the site and doing nothing else would appear to be £2.8m.

### **4. Likelihood of development being financially viable**

The Viability Report by BPS Chartered Surveyors (March 2022) shows (Section 1.7, page 2) the overall profitability of the 4 options as varying between a surplus of £1,121,774 on option 2 which has a Gross Development Value of £315,280,000 (a 0.4% return) to a whopping deficit of £107,399,524 on option 3 which has a gross Development Value of £227,540,000. These are after making some best-case adjustments to assumptions (10% lower building costs and 10% higher GDV values) which seems unlikely to occur in an inflationary period with higher interest rates.

With the most favourable option only showing a 0.4% surplus our conclusion is that BPS are indicating that the financial viability of the best option is so marginal that the financial viability of development is questionable. On these assumptions and

numbers our conclusion is that any development would only be viable if the development was densified i.e if there were more houses.

We can therefore see no overriding financial reason why any development should take place.

#### **5. Recreational impacts on wildlife**

The Adur Valley is already heavily impacted by recreational activities and would undoubtedly support more biodiversity if these impacts could be reduced.

Separately the River Adur sub-group of the Ouse and Adur Catchment Partnership has already noted the detrimental effect recreational waterbourne activity is having on the Adur south of the A27, including on the River Adur SSSI and the reserve in Shoreham owned by the Royal Society for the Protection of Birds (RSPB).

Given this, we would be strongly opposed to any plans to use the Cement Works site as a new base for water activities on the Adur, and/or for any launch points for water craft being included in such plans, as this would further exacerbate the problems that waterborne recreational activities are causing nature on the river.

#### **6. Conclusion - the best solution for nature and the landscape is to tidy the Cement Works up and leave it ot rewild**

To conclude, we feel that this area remains fairly rural in atmosphere, is situated within the National Park, and we are doubtful if any of the current proposals will successfully enhance the landscape setting or prove financially viable to a developer. Any major tourist "honey pot" development, which would create major increases in traffic and recreational pressures in the immediate area, should be ruled out. Instead, we believe the most sensible thing for this brownfield site would be to pull down some of the existing buildings, keep the site closed to public access, and let it rewild into what should become a wonderful site for nature. A viewing platform along the A283 and perhaps somewhere near the cliff edge would enable the public to enjoy views of this wonderful area as it rewilds.

Jon Curson has prepared a short paper on the importance to wildlife of undeveloped "brownfield" sites, and this is attached as an annex to this submission, as an example of the benefits to wildlife of letting the Cement Works rewild naturally.

We suggest that our proposals represent the best way to enhance the landscape views rather than to have views of a major development of up to 400 houses, light industrial units and recreational facilities blighting the National Park.

We also feel that such a solution would be in keeping with the objectives of National Parks rather than building a major development which is the last thing we expect to see the SDNP promoting.

Yours sincerely,

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(SOS Conservation Officer)  
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## **SUSSEX ORNITHOLOGICAL SOCIETY**

### **Annex to submission on Shoreham Cement Works AAP consultation**

#### **The importance of 'brownfield sites' for birds and other wildlife**

**By Jon Curson, local Ecologist and SOS Council member**

The term 'brownfield' sites' as used refers to sites that are not developed, and have a natural or semi-natural vegetation, but that are not protected and do not necessarily contain rare or scarce habitat types such as calcareous grassland, heathland or ancient woodland, although they may do so in some cases.

Such areas are actually very important for wildlife, including many of the common and widespread species that we take for granted but which are already declining across the country due to ongoing losses of these areas to development.

Brownfield sites occur throughout the country, covering small to quite large areas, often within the urban/suburban environment, and contain habitats such as open grassland, areas of nettle/thistle/bramble; also blackthorn/hawthorn/elder scrub (plus willow scrub in damper areas) and sometimes areas of more mature woodland. They can occur on areas that were previously developed but have been left to vegetate naturally (hence the name 'brownfield sites') but also include (for example) areas in urban/suburban locations that have never been developed, abandoned quarries and large gardens and parkland that is not dominated by 'amenity' grassland.

Such areas (particularly previously developed sites that have been left to re-vegetate) are often regarded as 'waste ground' and of limited wildlife value. This is far from the case however. These areas may not contain the rare vegetation types which tend to be the focus for both planning authorities and conservationists, but they provide habitat and shelter for many of our more common, widespread and familiar species.

To give a few examples – areas of ground dominated by 'weeds' such as thistles, nettles and brambles provide a valuable nectar and pollen source for a wealth of insects – bees are frequently mentioned in this context for their importance as pollinators, but flies, moths and many other insects are important pollinators also.

Nettles are the foodplant for the caterpillars of small tortoiseshell and peacock, two of our most familiar butterflies. Areas of rough grassland offer habitat for butterflies such as meadow brown, a multitude of other insects, small mammals and feeding/nesting areas for many species of birds – goldfinches are particularly fond of thistle seeds, which are an important food source for them in some areas.

Areas of scrub provide vital nesting areas for birds as well as food for many species – blackthorn is especially important, with the thorny vegetation providing secure nesting sites, the flowers providing a vital nectar and pollen source for early spring insects and the sloe berries offering an important food source in the autumn. On the Sussex coastal strip many migrating species (such as thrushes) rely on them to fuel their onward migration across the Channel.

Brambles and blackberries are also useful in the same way. Areas of bare ground quickly become colonized by plants such as ground ivy, birds-foot trefoil and other common 'early successional' plants, which are important for insects, and such areas

provide excellent habitat for seriously declining species such as dingy and grizzled skipper butterflies.

These familiar species are still common and widespread because the sites on which they depend still occur in small to quite large areas throughout the country, often in towns, but also along riverbanks, field edges, fallow fields and in wetland areas. However, these places are increasingly being lost to development (especially now with the pressure on Local Authorities to provide more housing) and though the loss of individual sites may go more or less un-noticed, when this is happening on a daily basis all over the country, the cumulative loss of these habitats has a huge impact, and many species are already in serious decline.

Insects are often used as indicators of the health of our environment because they provide food for so many other species. A study of moth populations<sup>(1)</sup> provides a stark example of the losses that are occurring already. There are many moth species that are habitat generalists and are still widespread across the country. A long-term, countywide, study of their population change has shown that many of them are suffering alarming declines – in fact there are 30 or so species which, although often still widespread, have suffered declines of 26% to an astonishing 86% across the country over just the past 10 years<sup>(2)</sup>. The precise causes of these declines is not yet known, but initial research suggests that incremental losses of ‘brownfield’ and similar sites (as well as factors such as increased light pollution) may well be one of the principal causes.

This particular study is one of the longest-running and intensive anywhere in the world – it must surely be the case that other insect groups are suffering similar declines that are going largely un-noticed. Insects of course provide food for birds and mammals (as well as other insects!) and even seed eating birds such as finches and sparrows need protein-rich insects to feed their young. It stands to reason that one of the reasons many bird species (house sparrow and starling for example) are declining is precisely because of the large-scale loss of these sites, depriving them not only of nesting sites but also of a food source on which they depend.

To summarise then, areas of ‘waste ground’ are a very important habitat for much of our most familiar wildlife and the continued loss of them will only accelerate the declines that many of them are now undergoing.

In a local Sussex context, the Beeding Cement Works is a superb example of a large area of exactly the sort of valuable wildlife habitat discussed in this note.

<sup>(1)</sup> The Rothamsted insect Survey, which has been running since 1964.

<sup>(2)</sup> The State of Britain’s Larger Moths 2021, published by Butterfly Conservation