



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	SDNP/26/02786
LOCATION:	Shoreham Cement Works Shoreham Road Upper Beeding West Sussex
DESCRIPTION:	Scoping Opinion for Shoreham Cement Works
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Environmental Impact Assessment Scoping Report, Prepared by Fairhurst, Dated July 2026	

MAIN COMMENTS:

1. Environmental Health has reviewed the submitted EIA Scoping Report for the proposed redevelopment of Shoreham Cement Works and considers that the proposed development has the potential to give rise to significant environmental effects during demolition, remediation, construction and operation. We therefore agree that Air Quality, Noise, Light, and Land Contamination should form part of the planning application. The site's former cement manufacturing use, extensive quarrying history, historic landfill deposits and proposed mixed-use redevelopment present a number of potentially significant environmental considerations that require detailed assessment.

Air Quality

2. Given the scale of the proposed redevelopment, including demolition of existing structures, remediation, site preparation, extensive earthworks and subsequent construction activities, Environmental Health agrees that a detailed Air Quality Assessment should be undertaken as part of the planning application.
3. The assessment should specifically consider:
 - Dust and particulate emissions arising from demolition of existing buildings and structures
 - Dust generation from groundworks, remediation activities and movement of construction materials
 - Dust generation associated with excavation, regrading and handling of chalk and made ground materials
 - Removal of hardstanding and existing surfacing
 - Potential impacts associated with asbestos removal works where relevant
 - Construction traffic movements and routing
 - Impacts upon nearby residential properties and other sensitive receptors
 - Operational traffic impacts associated with the completed development
 - Emissions associated with future commercial and industrial uses proposed within the development.
4. For major applications, it is recommended that applicants supplement local authority monitoring with site-specific monitoring to improve model accuracy and confidence in the results.

The assessment should be transparent, clearly documenting all input data, assumptions, and methodologies used (either within the main report or appendices). Full statistical analysis should also be provided to demonstrate model performance.

The Gatwick meteorological station may not be representative of the site. Upper Beeding is influenced by the English Channel and the South Downs and has a different terrain. The applicant should therefore consider if other meteorological stations could be more representative.

5. Whilst the Scoping Report discusses construction impacts, Environmental Health considers that the demolition phase should be explicitly assessed within the planning application due to the scale of the existing structures and the potential for significant dust generation. The proposed demolition period appears short given the scale and complexity of the existing buildings and potential asbestos presence, and any assumptions used within the assessment should be appropriately justified.
6. The site comprises a former cement works and quarry and Environmental Health considers that specific consideration should be given to mineral dust impacts in addition to conventional construction dust impacts. The planning application should

assess the potential for dust generation from excavation, reworking and movement of chalk materials and historical deposits across the site.

7. The Air Quality Assessment should follow current recognised guidance, including relevant IAQM, EPIC and Sussex Air Quality guidance where applicable, and should clearly justify the screening assumptions used. In particular, clarification should be provided regarding the conclusion that construction and demolition traffic would not trigger the need for detailed modelling. Given the scale of proposed demolition, remediation and development, Environmental Health would expect robust evidence to support this conclusion.
8. The operational assessment should also consider the wider highway network affected by the development. The assessment should identify all relevant sensitive receptors and Air Quality Management Areas potentially affected by development traffic, rather than focussing solely on those closest to the site. Consideration should be given to traffic impacts on nearby settlements and routes that may experience increases in HGV and other development-related traffic during both the construction and operational phases. For example, the report mentions the Worthing Grove Lodge/Lyons Farm AQMA, but not the Storrington AQMA which would likely also be affected by an increase in traffic from this development.
9. This proposal is classified as a major development; therefore, the applicant must submit an Air Quality Assessment and an Emissions Mitigation Statement, including a damage cost calculation. Mitigation measures for the proposed development should align with the Sussex Air (2021) *Air Quality and Emissions Mitigation Guidance for Sussex*.

This guidance adopts a low-emission strategy approach to minimise the health impacts of cumulative development by requiring mitigation or offsetting of emissions from additional traffic and building. The Emissions Mitigation Statement should provide an itemised cost for each proposed mitigation measure, along with the total cost of all measures. This total should be equal to the calculated emissions damage cost.

10. The Sussex Air Quality Guidance is intended to avoid duplication of mitigation measures that are already required under other regulatory regimes. The applicant has suggested the inclusion of EV charging points as mitigation, but this would not be accepted as they are already required in Part S of the building regulations. Air Quality mitigations must go above and beyond what is already required. In addition, applicants must include an Assessment of Dust from Demolition and Construction in accordance with the guidance.
11. The proposed development includes significant areas of employment land incorporating Uses Classes E, B2 and B8. At this stage the nature of future industrial and commercial occupiers is not known. The EIA should therefore consider whether future uses could give rise to emissions to air beyond those associated with road traffic, including combustion plant, industrial processes, dust-generating activities and any activities that may require environmental permitting under the Environmental Permitting Regulations.
12. The proposed phasing strategy should also recognise that residents and occupiers of completed phases may become sensitive receptors whilst construction activity continues elsewhere on the site. The assessment should therefore consider the exposure of future site occupants to dust, particulate matter and construction traffic emissions during later phases of development.

13. There is limited existing local authority air quality monitoring data available in the immediate vicinity of the site. Given the scale and complexity of the proposed development, the applicant should undertake an appropriate programme of site-specific air quality monitoring to inform the baseline assessment and any subsequent air quality modelling. The monitoring strategy should be agreed with the relevant local authorities where appropriate and should provide sufficient coverage to enable robust verification of dispersion modelling and assessment of potential impacts at existing and future sensitive receptors. Reliance solely on existing monitoring data from more distant locations may not adequately characterise baseline conditions in the vicinity of the site.
14. A Construction Environmental Management Plan (CEMP), Demolition Management Plan (DMP) and appropriate Air Quality Mitigation Plan should be prepared proportionate to the scale and complexity of the development. Information regarding Non-Road Mobile Machinery (NRMM) to be used in the construction phase should be provided in the CEMP.
15. In line with the Interim Planning Guidance published in October 2024 on the Environmental Act PM2.5 target, applicants should demonstrate that they have identified key sources of air pollution within the development and have taken all reasonably practicable measures to minimise emissions of PM2.5 and its precursors.

Land Contamination

16. Environmental Health strongly supports the inclusion of Land Contamination, Geology and Hydrogeology within the Environmental Impact Assessment.
17. The site has an extensive industrial history associated with cement manufacture, quarrying and associated activities. The Scoping Report also identifies areas of historical landfill and waste deposition, including substantial Cement Kiln Dust deposits. Given the scale, complexity and historic uses of the land, there is significant potential for contamination to be present, including considerable variation across different parts of the site.
18. Environmental Health considers that the proposed scope for land contamination should place particular emphasis on:
 - The site's industrial legacy and associated contamination risks
 - Historic landfill deposits and made ground, in particular The Bowl zone
 - Cement Kiln Dust and associated waste materials
 - Risks to future site users, construction workers and neighbouring receptors
 - Ground gas and landfill gas generation, migration and accumulation
 - Risks associated with asbestos-containing materials within structures, made ground and soils
 - Risks to controlled waters including the Principal Chalk Aquifer and River Adur
 - The extent and nature of remediation work required to make the site suitable for the proposed end uses
19. The historical landfill identified within the site should form a key element of the assessment. Environmental Health would expect the planning application to include detailed consideration of the nature, extent and composition of landfill deposits together with any associated risks from contamination, leachate generation, ground gas production and long-term management requirements.
20. Environmental Health notes that the site is underlain by a Principal Chalk Aquifer and that the Scoping Report identifies karstic and dissolution features that could facilitate rapid contaminant migration. Given the hydrogeological sensitivity of the

site and its proximity to the River Adur, the planning application should place significant emphasis on contaminant migration pathways, potential impacts on groundwater quality and risks to surface waters.

21. Ground gas risks also require careful consideration. Given the presence of historical landfill deposits and extensive made ground, the planning application should include appropriate gas monitoring, risk assessment and consideration of any gas protection measures that may be required for future development.
22. Environmental Health also considers it important that the planning application assesses the impacts arising from remediation activities themselves. Significant effects may arise through excavation and handling of contaminated materials, disturbance of landfill deposits, management of asbestos-containing materials, movement of contaminated soils and potential off-site disposal activities. These effects should be assessed alongside the risks posed by contamination remaining in situ.
23. Where residential development is proposed, the planning application should demonstrate how appropriate clean cover systems, verification measures and long-term management arrangements will be secured where necessary to ensure the site is suitable for its intended use.

Private Water Supply

24. The Scoping Report refers to the use of existing on-site abstraction boreholes as a future water supply for the development. Whilst water supply arrangements are not considered a material planning matter for Environmental Health in relation to this application, it should be noted that any private water supply serving the development would fall within Environmental Health's regulatory responsibilities under the Private Water Supplies Regulations. The applicant should therefore have regard to future requirements relating to risk assessment, monitoring, treatment and compliance with relevant drinking water standards should a private water supply be utilised.

Noise

25. The outline development layout shows residential development located in two areas of the development site. The eastern parcel located at the eastern end of the former quarry and the western parcel located adjacent to the A283 and river Arun. The central part of the site is allocated for commercial/industrial uses. For the western parcel road traffic noise from the A283 will be a particular concern while noise from the commercial/industrial activities has the potential to impact both residential parcels. This potential for disturbance means that it is unlikely that this authority would support 24-hour operations for the commercial/industrial uses unless the development scheme has been designed to minimise noise impacts. To further explore the potential noise constraints, it is recommended that an environmental noise survey be required together with commercial noise impact assessment to determine appropriate noise targets for commercial/industrial activities, plant and vehicle movements.

Light

26. The development site is not located near any principal settlement and extends east into the national park. The eastern part of the quarry is likely to be very dark in character. Any exterior lighting scheme should be designed to minimise obtrusive light in accordance with the ILP Guidance on The Reduction of Obtrusive Light as well as relevant ecological lighting guidance.

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DATE:	05/08/2026