ADUR DISTRICT COUNCIL

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OFFICER REPORT ON A SCOPING OPINION REQUEST UNDER THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2011

Reference:- EIAOPINION/0001/16

Applicant: Southern Housing Group

Case Officer: Cian Cronin

Proposal:- The comprehensive redevelopment of the the Free Wharf site of approximately 2.96 ha (approximately 0.28 ha within the River Adur and 2.68 ha on-land) to provide a residential-led mixed –use development accommodated in a variety of resdidentials typologies, with a mix of public and private amenity spaces at ground floor, podium and roof level.

The proposed development will provide:

- 565 residential units;
- 2,600 m2 retail/restaurant/café use;
- Residents Community Space;
- 1,200 m2 Hub Style Commercial units; and
- 520 residential car parking spaces and 90 commercial/leisure/retail parking spaces.

The proposal includes two jetties with mooring pontoons and a combined riverside cycle-path and walkway. The proposed development is expected to comprise the construction of nine blocks, predominantly ranging from ground plus six to nine storeys in height, with the exception of one taller building which could be up to ground plus 12 storeys in height.

The landscape proposals for the proposed development aim to deliver considerable public realm, biodiversity and amenity enhancement compared to the existing industrial landscape in the area.

1. ENVIRONMENTAL IMPACT ASSESSMENT (EIA) AND SCOPING

1.1 Environmental Impact Assessment (EIA) is an iterative process that attempts to ensure that any significant effects on a range of environmental issues that might result from a particular development are fully understood and taken into account prior to any planning decision being taken.

1.2 Scoping forms part of the overall EIA process, and attempts to identify all of the possible environmental impacts that a development project might cause, and then to subsequently determine which of those impacts are likely to be significant and which therefore require detailed investigation in the EIA.

1.3 The effects of the proposal on a range of environmental topics should be assessed in terms of the characteristic (adverse, beneficial, neutral, direct, indirect, cumulative), scale (international, national, regional, district, local) and significance (long-term, short-term, irreversible, reversible, major, minor) together with their timing (reconstruction, construction, operation/occupation, decommissioning, restoration).

1.4 Where the potential for significant environmental effects have been identified as part of a scoping exercise, the Environmental Statement (ES) comprising part of the EIA process should propose mitigation and monitoring measures.

1.5 The scoping request was received by Adur District Council on 09th June 2016 and as such was considered under the 2011 EIA regulations (as amended in 2015). The EIA regulations have since been updated, in 2017. Whilst the amendments captured within the 2017 EIA Regulations are broadly considered to be best practice measures and will be accounted for within the ES, as appropriate, Part 12 Regulation 76 (2a) of the 2017 EIA Regulations sets out transitional arrangements. This allows for projects scoped prior to 16 May 2017 to be undertaken under the 2011 EIA Regulations (as amended in 2015). This arrangement applies to the proposed development and the scope and format of this ES will be prepared accordingly.

1.6 Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 forms the basis for the scooping procedure by allowing a “person minded to make an EIA application” to ask the relevant planning authority to state in writing their opinion as to the information to be provided in the environmental statement (ES) in the form of a scoping opinion.

1.7 The Scoping Opinion shall not preclude Adur District Council from subsequently requiring the applicant to submit further information in connection with any submitted development application to the Council in accordance with Regulation 13 (9) of the 2011 Environmental Impact Assessment (EIA) Regulations.

2. INTRODUCTION

2.1 This Scoping Opinion is based on information provided to Adur District Council (ADC) by Ramboll Environ, together with the comments and opinions from consultation with other statutory and non-statutory bodies.

2.1.1 A scoping exercise was initiated following the receipt of documents on 07/06/2016 and subsequently acknowledged on 09/06/2015 a formal request for a scoping opinion.

2.2 This scoping opinion has been based on the information provided by the applicants in "Free Wharf EIA Scoping Opinion Request Report which identifies the development as comprising the construction of nine blocks, providing a phased residential led, mixed-use development fronting the River Adur, with some commercial, restaurant and retail use on the ground floor, a riverside walkway and cycleway, leisure uses, jetties and mooring pontoons.

3. REQUIREMENTS OF AN ENVIRONMENTAL IMPACT ASSESSMENT

3.1. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 require that any proposed development falling within the description of a 'Schedule 2 Development' within the meaning of the Regulations, is required to be subject to an Environmental Impact Assessment where such development is anticipated to have 'significant' effects on the environment by virtue of such factors as its nature, size or location (Regulation 2). As confirmed by the screening opinion produced by Adur District Council dated 23/03/2015 the proposed development is considered to fall within Schedule 2, section 10(b).

3.2. The relevant EIA threshold in considering if Schedule 2 development requires an EIA the following criteria are important (as discussed in Schedule 3 of the Regulations):

- The characteristics of the development
- The environmental sensitivity of the location
- The characteristics of the potential impacts
- If the development is in, or partially in, a 'sensitive area'

3.3. With regard to the selection criteria in Schedule 3, Adur District Council considers that the development could have significant effects on the environment due to socio-economics; archaeology; transport and accessibility; air quality; noise and vibration; daylight, sunlight, overshadowing and solar glare; wind; ecology; and cumulative effects.

4. THE ENVIRONMENTAL STATEMENT

PART I

4.1 Description of the development, including in particular:

a) A description of the physical characteristics of the whole development and the land use requirements during the construction and operational phases
b) A description of the main characteristics of the production processes
c) An estimate, by type and quantity, or expected residues and emissions resulting from the operation of the development

4.1 An outline of the main alternatives studied by the applicant and an indication of the main reasons for the choice, taking into account the environmental effects.

4.2 A description of the aspects of the environment likely to be significantly affected by the development including, in particular, population, fauna, flora, soil, water, air,

climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.

4.3 A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects of the development resulting from:

a) The existence of the development
b) The use of natural resources
c) The emission of pollutants, the creation of nuisances and the elimination of waste and the description by the applicant of the forecasting methods used to assess the effects on the environment

4.4 A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.

4.5 A non-technical summary of the information provided above under paragraphs 4.1 to 4.5.

4.6 An indication of any difficulties (technical deficiencies or lack of know-how encountered by the application in compiling the required information.

PART II

4.7 A description of the development comprising information on the site, design and size of the development.

4.8 A description of the measures envisaged in order to avoid, reduce, and if possible, remedy significant adverse effects.

4.9 The date required to identify and asses the main effects which the development is likely to have on the environment.

4.10 An outline of the main alternatives studied by the applicant and an indication of the main reasons for their choice, taking into account the environmental effects.

GENERAL CONSIDERATIONS

4.12 The Environmental Statement should be concise and clear in its presentation. It should report on all impact assessments detailed in this Scoping opinion. Details of the process and methodologies used for the collection of baseline date, predictions and assessments of impacts should be clearly set out. How the Environmental Statement has shaped the design and the implementation of the development proposals should be stated. Key mitigation measures should be highlighted and their effectiveness explained.

5. ASSESSMENT OF EFFECTS

5.1 In support of their Scoping request, a Scoping Report has been submitted by Ramboll Environ that provides details of key issues that the applicant recommends should be addressed in the Environmental Statement ('ScopedIn'). These include socio- economics; archaeology; transport and accessibility; air quality; noise and vibration; daylight, sunlight, overshadowing and solar glare; wind; ecology;

townscape, and cumulative effects. The Council consider that potential for pollution of the adjacent water course should be given a greater prominence in the ecology section and a more evident reference to this potential impact should be scoped into the Environmental Statement.

5.2. The report also identifies key issues which would be excluded from the Environmental Statement ('Scoped-Out') as they are not likely to have a significant effect. These include telecommunications and broadcast services appraisal; Water Resources and Flood Risk; Ground Conditions; Waste; Health & Wellbeing; Light Spillage; Aviation.

5.3. The following comments are made in respect of key chapters of the Environmental Statement:

Socio Economics

5.4 Paragraphs 6.2 to 6.2.2 of the scoping report explain how the impacts of the proposed development on the existing local community, and future residents, would be investigated and assessed.

5.5 Review of relevant policy – The report identifies that the site is part of the wider Shoreham Harbour regeneration and references the relevant national and local planning and other policy, and identifies a number of stakeholder bodies that would have an interest in the provision of education and health services.

5.6 Description of baseline conditions – The report identifies sources of information that would be used to construct a description of baseline conditions for the area in which the development site is located, in terms of population and demographics. The statement will assess population, housing, employment and economy, education facilities, healthcare facilities, and open space provision among other indicators.

5.7 Impacts scoped into & out of the assessment – The impacts that would be assessed include the generation of direct and indirect employment and training opportunities associated with construction; Creation of permanent direct and indirect, long-term employment opportunities associated with the proposed commercial land uses; Additional expenditure resulting from additional employees, residents and potential visitors; Provision of new homes; Demands from the new residential population on community facilities including any recreation areas and open space (including children's play space), healthcare and schools (primary and secondary; and effects on crime, including perceptions of public safety. Matters that would not be assessed include demand for employment and employment creation, commuting patterns, retail and private leisure facilities, views and house prices.

5.9 Method of assessment – The report details the methods by which the social and community well-being impacts, and the recreational impacts of the development would be assessed. In the submitted report reference should be made to the Homes & Communities Agency's additional guidance to inform the impact assessment for social and community wellbeing. The report identifies that the assessment will be undertaken by reference to professional judgement and experience. It is considered that in addition to professional judgement the statement should include a combination of desk-based sources, consultation with local stakeholders, and expert judgement to form the basis for the assessment of the development's impacts.

5.10 Mitigation & enhancement – The development would be designed to be self-contained, so far as possible, and that measures to address gaps in provision of

social and community infrastructure or services would be addressed through planning obligations.

5.11 Consultation – Consultations would be carried out with community interest providers, and with recreational interest groups. It is recommended that the education, social care, public health and rights of way access services of the County Council be consulted, as well as the relevant primary healthcare commissioning body

Economic Issues

5.12 The Scoping report explains how the economic impacts of the proposed development would be investigated and assessed. Whilst it is common practice for assessments of the economic impacts of proposed development to be documented as part of Environmental Statement, such information is not recommended by the Regulations (Schedule 4, Part 1, paragraph 3). It is recommended that the assessment of the economic impacts of the proposed development be more appropriately addressed as part of the planning statement, or as a Economic Issues Assessment which is referred to within the report, but not as part of the Environmental Statement.

Townscape, Heritage and Visual

5.13 Paragraph 6.3 to 6.3.2 of the scoping report explain how the townscape, heritage and visual impacts of the proposed development would be investigated and assessed.

5.14 Review of relevant policy & guidance – The report does not provide a list of the national and local level planning policies that relate to the protection of the landscape and the safeguarding of visual amenity. Key guidance documents for landscape and visual impact assessment (LVIA), produced by the Landscape Institute, the Institute of Environmental Management & Assessment (IEMA) and Natural England are referred to for guidance when preparing the statement.

5.15 Description of baseline conditions – The baseline situation with reference to heritage, townscape character is described in the report. However, the final report should make reference to existing baseline conditions reports including landscape character assessments prepared by West Sussex County Council and Adur District Council.

Townscape / Heritage

5.16 An outline description of the headline townscape, heritage and visual impact issues are referenced in section 6.3. This includes reference to townscape character areas, and listed buildings.

5.17 The Council consider that the Environmental Statement should pay particular attention to any potential impact on the setting of the Church of St Mary de Haura in Shoreham from the proposed development. The church is a grade I listed building. Part of its significance as a heritage asset derives from its prominent location in the town centre and its prominence in terms of height when viewed from the Southdowns and the river. The environmental assessment should include a detailed consideration of the impact of the proposal on the setting of the heritage asset and the impact the development would have on the interpretation of the heritage asset.

Visual Impact

5.18 It should be noted that the contrary to the commentary in paragraph 6.3.1, 6th paragraph, that the surrounding countryside is not AONB, but comprises the highest

level of landscape designation through its inclusion in the Southdowns National Park. It is disappointing the scoping report does not make any reference to the National Park in its considerations.

5.19 The visual amenity baseline for the site and the surrounding area, in terms of significant viewpoints from which it may be possible to obtain views of the proposed development site have not been identified in the scoping report, though officers have received information on this separately as part of pre-application discussions.

5.20 Impacts scoped into & out of the assessment – Details provided of the landscape and visual impacts that will be covered by the assessment. The potentially significant landscape character effects that would be expected to arise from the development include;

- Temporary change in townscape character and visual intrusion during construction works;
- Changes to the character, context and quality of the application site and local townscape;
- Changes to selected key views
- Changes to the settings of heritage assets including listed buildings, unlisted buildings of merit and conservation areas.

5.21 It is considered that the Environmental Assessment should also consider changes in the special qualities of the Southdowns National Park.

5.22 The potentially significant visual impacts that would be expected to arise from the development should be assessed with reference to a range of sensitive receptors, including local residents, local road users, river users, users of the surrounding rights of way network, and visitors to the wider area. No impacts or receptors were scoped out of the assessment.

5.23 Method of assessment – The LVIA would be carried out in accordance with the Landscape Institute and IEMA best practice guidelines. It would cover a significant study area extending into the national park to the north. The proposed approach is consistent with best practice for LVIA.

5.24 Mitigation & enhancement – The scoping report does not set out how mitigation of predicted landscape and visual impacts would be achieved.

5.25 Consultation – It is suggested that consultations on the proposed methodology should be carried out with the local planning authority, the Southdowns National Park, Historic England and Natural England.

Archaeology

5.26 Paragraphs 6.4 to 6.42 of the scoping report explain how the impacts of the proposed development on cultural heritage and archaeological assets would be investigated and assessed.

5.27 Review of relevant legislation, policy & guidance – The report appropriately identifies the relevant national legislation, and national and local planning policy that deal with the protection of archaeological assets and the built heritage.

5.28 Description of baseline conditions – the report identifies that there are no statutorily designated heritage assets on the application site or immediately adjacent, and that the site does not lie within a conservation area. The report identifies that historic mapping identifies that the application site is located on what was previously intertidal foreshore and that the site lies entirely within artificial ground which suggests that any

archaeological remains on the site will be deeply buried beneath substantial deposits of made ground which are of no archaeological interest.

5.29 The report does not draw a conclusion on the archaeological potential of the development site but it is considered to be low.

5.30 Impacts scoped into & out of the assessment – For the construction phase, the main impact of concern relates to the destruction or damage of archaeological or heritage sites, and for the operational phase the main effects of concern relate to the changes in the setting and context of designated sites and historic structures. The report states that given the absence of any nationally important heritage sites from the development site and surrounding area, the impacts of the development on such assets would not be assessed during the EIA process. The consultation response from the County Archaeologist requests that "an assessment should also be made of the geo-archaeological potential of the deeper deposits on the site which are likely to be penetrated by construction piling."

5.31 Method of assessment – The report provides an account of the way in which the assessment of archaeological and heritage impacts would be approached. Reference is made to guidance published by the Institute for Archaeologists and Historic England. The assessment would draw on established resources including the National Monument Record, the West Sussex Historic Environment Record and Historic England's records. The study area for the assessment would be restricted to the development site.

5.32 Mitigation & enhancement – The nature of potential mitigation measures will be determined in consultation with West Sussex County Council Archaeologist following the preparation of the EIA. Archaeological fieldwork may be required to clarify issues relating to sub-surface archaeological deposits. The applicants have indicated that any fieldwork (if required) would be secured by means of an appropriately worded planning conditions should planning permission be approved.

5.33 Consultation – Consultations would be carried out with West Sussex County Council's Archaeological Officer and with Historic England.

Transport and Accessibility

5.34 Paragraphs 6.5 to 6.5.2 of the scoping report explain how the transport, traffic and access impacts of the proposed development would be investigated and assessed.

5.35 Review of relevant policy & guidance –The report identifies the national and local planning and transport policy relevant to the proposed development, and relevant local and national guidelines.

5.36 Description of baseline conditions – The report identifies the studies and investigations that would be undertaken to develop an understanding of the baseline situation at the development site. The Environmental Statement will detail turning count surveys, and traffic count surveys which will be carried out following discussion with the District Council and the County Council.

5.37 Impacts scoped into & out of the assessment – The report outlines the impacts that would be covered in the course of the assessment, for the construction and operational phases of the proposed development. The range of issues to be addressed includes:

- Temporary disruption to pedestrians, cyclists and road vehicle users during the construction works;

- Temporary generation of Heavy Goods Vehicles (HGVs) during the construction works;
- Changes to traffic flows and the capacities of the local highway network upon completion and operation of the proposed development;
- Impacts upon users of Humphreys Gap, A259 Brighton Road, A283 Old Shoreham Road and Eastern Avenue including the railway crossing;
- Changes to pedestrian and cycle facilities, including safety issues;
- Changes to public transport capacity and accessibility;
- Changes parking supply and demand (this will be undertaken as part of the Transport Assessment to be appended to the Environmental Statement);
- Changes to long-term access and servicing arrangements; and
- Changes to pedestrian amenity (including fear and intimidation; severance; delay).

5.38 Method of assessment – The report provides an account of the proposed method of assessment and scenarios. The report does not outline how in terms of an environmental statement what criteria will be used in determining receptor sensitivity, impact magnitude and impact significance.

5.39 Reference is also made to the IEMA's guidelines for the environmental assessment of road traffic, as well as guidance set out in the Department for Transport's Design Manual for Roads & Bridges.

5.40 Mitigation & enhancement – Mitigation measures are likely to include, off-site junction improvements, Waste and Servicing Strategy, and the preparation and implementation of a Travel Plan for the completed development.

5.41 Consultation – The scope of the transport assessment would be agreed through consultation with the County Highway Authority (Surrey County Council).

5.42 To date, no comments have been received from West Sussex County Council Highway Authority in relation to the Scoping Report.

Air Quality

5.43 Paragraphs 6.6 to 6.6.2 of the scoping report explain how the air quality impacts of the proposed development would be investigated and assessed.

5.44 Review of relevant policy & guidance – The report identifies national and local level policy relevant to the questions of air quality. Reference is made to Environmental Protection UK's guidance on the consideration of air quality effects in land use planning decisions.

5.45 Description of baseline conditions – The report does not identify the extent of the area to be covered by the air quality assessment but sets out that the assessment will be based on existing background conditions in the District. The report identifies that the site is located in close proximity to the Shoreham Town Centre AQMA and that there are a number of sensitive receptors within close proximity of the site including residential and recreational facilities.

Impacts scoped into & out of the assessment – The report identifies that the air quality assessment would consider both nitrogen dioxide emissions and particulate matter emissions from traffic. For the construction phase, dust and fine particulate matter would be the emissions of principal concern. For the operational phase, traffic generated by the completed development as a source of potentially significant

impacts and the proposed energy plant and servicing strategy would be sources that would need to be addressed.

5.46 Method of assessment – The report details approaches that would be adopted for the assessment of air quality impacts. A qualitative assessment of the dust impacts of the construction and demolition phase of the development would be undertaken in line with the Institute of Air Quality Management's guidance. The air quality assessment for the operational phase of the development would be carried out in accordance with Environmental Protection UK's guidance on planning and air quality.

5.47 Mitigation & enhancement – – Mitigation measures for construction would include measures recommended in the Institute of Air Quality Management's guidance. For the operational phase, appropriate mitigation measures would be integrated into the designs of the proposed development.

5.48 Consultation – Consultations on the method of assessment would be undertaken with the Council's Air Quality Officer.

Noise and Vibration

5.49 Paragraphs 6.7 to 6.72 of the Scoping Report explain how the noise and vibration impacts of the proposed development would be investigated and assessed.

5.50 Review of relevant policy & guidance – The Report outlines the key national and local planning and other policies that relate to the control of noise, and standards and guidance relevant to the assessment and management of noise and vibration.

5.53 Description of baseline conditions – The baseline noise conditions at the development site were previously determined through surveys already carried out.

5.54 Impacts scoped into & out of the assessment – The Report details the impacts that would be covered by the assessment for the construction and operational phases of the proposed development. It proposes to scope out vibration as there is a lack of vibration sources within a close proximity to the site. The proposed approach is agreed.

Ecology

5.55 Paragraphs 6.8 to 6.8.2 of the scoping report explains how the ecological impacts of the proposed development would be investigated and assessed.

5.56 Review of relevant legislation, policy & guidance – The suite of legislation, policy and guidance identified in the scoping report is appropriate. The full assessment will contain a review of policy considerations and the legislative framework and requirements.

5.57 Description of baseline conditions – Ecological baseline conditions, in terms of the relationship of the development site to statutory and nonstatutory designated sites, and in terms of the habitats and species found on, or near to, the development site are described within the report.

- The nearest SSSI is the Adur Estuary SSSI, located approximately 470 m to the west of the application site.
- Shoreham Beach LNR is located approximately 500 m to the south and Widewater Lagoon LNR is located approximately 1.8 km to the south-west.

- Shoreham Port is a member of the Brighton & Hove and Lewes Downs Biosphere Partnership, which has successfully applied to become a UNESCO Biosphere Reserve

5.58 Paragraph 6.8.1 (p.33) reports on the findings of an extended Phase I habitat survey carried out in May 2016, which identified existing species across the site. The existing buildings were excluded from the consideration of habitat types as they are or were to be demolished under the existing consent.

5.59 Method of assessment – The impact assessment would be carried out in accordance with the Chartered Institute of Ecology & Environmental Management (CIEEM) best practice guidelines. The ecological value of the development site and the surrounding area would be defined in line with the CIEEM guidance. The method that would be used to evaluate and classify the ecological impacts is consistent with best practice in ecological impact assessment.

5.60 Mitigation & enhancement – No information is given on the principal means of mitigation but this would normally involve the retention, where feasible, of existing habitats, and the creation of new habitats as part of proposed redevelopment.

5.61 Consultation – The report states that consultations would be carried out with local planning authority ecologists, Natural England and other relevant stakeholders.

Daylight, sunlight, overshadowing, and solar glare.

5.62 Paragraph 6.9 to 6.9.2 explains the potential impacts of the proposals in terms of mocroclimate effects relating to daylight, sunlight, overshadowing and solar glare.

5.63 The scoping in of this topic into the EIA is appropriate and the Applicant has taken into account all of the relevant the standard issues and requirements.

5.64 Description of baseline conditions - The applicant has set out that the baseline conditions as being the cleared site with two remaining buildings.

5.65 Method of Assessment - the report identifies that an assessment will be undertaken by reference to Daylight & Sunlight: A Guide to Good Practice, Second edition 2011 which is appropriate for the purposes of the project.

5.66 Mitigation - No mitigation methodology is set out, but the developers will need to be cognisant of statutory rights to light that will apply to any properties that are affected.

5.67 Consultation – The Council will carry out consultations with Environmental Health colleagues.

Wind microclimate

5.68 Paragraph 6.10 to 6.12 explains the potential impacts of the proposals in terms of wind microclimate. The scoping in of this topic into the EIA is appropriate and the Applicant has taken into account the standard issues and requirements, particularly the proposed application of the Lawson comfort criteria. There are no further comments to make.

Cumulative Effects

5.69 The cumulative effects of the development in conjunction with other developments in the area should be considered. In particular this should include the development of

132 dwellings a 1265m2 foodstore and 121m2 of ancillary commercial floorspace on the Parcelforce site (AWDM/0501/12) which is considered to be part of the same substantial development.

5.70 It is considered that the other 3 planning applications referenced in the scoping opinion (AWDM/0868/12- 32MW Renewable power generating facility; AWDM/0935/13 – outline permission for 120 dwellings, hotel, office and light industrial uses at ; and AWDM/1340/14 – outline application for erection of up to 106 dwellings at Upper Shoreham Road).

5.71 'The Town and Country Planning (General Permitted Development) Order 1995' grants planning permission for the classes of development described as permitted development in Schedule 2. Part 17 of Schedule 2 relates to development by statutory undertakers. Permitted development relating to Port and Harbour Authorities is included under Class B 'Dock, pier, harbour, water transport, canal or inland navigation undertakings' of this Part. The applicants should note that certain port related development can be permitted development, it may still have significant effects on the environment. Shoreham Port's consultation response has not identified any significant projects however, the applicants should contact Shoreham Port to ensure that they are aware of any relevant development taking place in under permitted development rights around Shoreham Port.

Consultation

6.1. During the scoping process, formal consultation occurred with the relevant statutory agencies and authorities and other relevant parties seen to have an interest in the proposal and/or having expertise in the environmental issues relevant to this site.

6.2. In accordance with Regulation 15(3)ii of the EIA Regulations, the following bodies were consulted:

6.3 Within the time frame for issuing a scoping opinion, the Council has received responses from the following bodies:

- West Sussex County Council (WSCC) – Highways Authority, Education Authority, Infrastructure ; Minerals Planning Authority (safeguarding of wharfs); Landscape officer – sea wall and other features;
- Environment Agency ;
- Natural England;
- Shoreham Port Authority;
- Historic England;
- South Downs National Park Authority;
- Water and Sewage Undertakers.

6.4 The responses received can be found on Adur & Worthing Councils' website; however, their comments have been incorporated into the response above.

Representations from Members of the Public

6.6 The Council received 13 letters of representation from members of the public. They highlighted concerns about traffic, infrastructure, density of the proposals and height of the proposed buildings.

Conclusion

6.6 The Council conclude that the proposed scheme would fall within Schedule 2, section 10 Infrastructure Projects, (b) Urban development projects of the Environmental Impact Assessment Regulations 2011.

6.7 With regard to the selection criteria in Schedule 3, the Council conclude that the development could have significant effects on the environment due to socio-economics; archaeology; transport and accessibility; air quality; noise and vibration; daylight, sunlight, overshadowing and solar glare; wind; townscape, ecology; and cumulative effects. The Council therefore concur with the applicants that the proposed development would comprise EIA development.

6.8 The above response identifies areas to be assessed within the ES which are agreed, matters which should be 'Scoped-into' the ES and matters that could be 'Scoped-out'.

6.9 Overall, the Council believe that the proposed Scoping Report would adequately address the requirements of the Regulations.

6.10 All outstanding statutory consultation responses will provided once received and these should be treated as an addendum to this Opinion.

Recommendation

6.11 That the above Scoping Opinion be issued