Lewis & Co Planning

town planning consultants

EIA SCREENING REQUEST REPORT

KINGSTON WHARF, BRIGHTON ROAD, SHOREHAM HARBOUR, SHOREHAM-BY-SEA, BN43 6RN



ON BEHALF OF HYDE NEW BUILD

FEBRUARY 2018

ADUR & WORTHING PLANNING SERVICES	
PLAN	EIAOPINION/0001/18
DATE VALID	28 FEB 2018

RTPI

mediation of space · making of place

Client: Hyde New Build

Site Location: Land at Kingston Wharf, Brighton Road, Shoreham-by-Sea, Shoreham Harbour, West Sussex, BN43 6RN

Job History:

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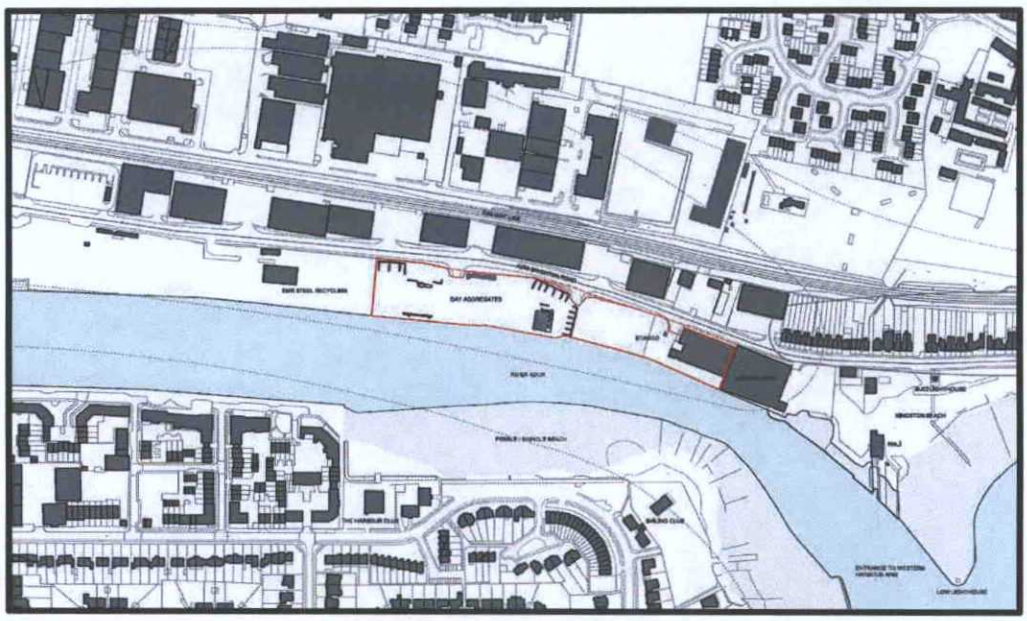
7. CONCLUSIONS

1.0 INTRODUCTION & EIA PROCESS

1.1 Hyde New Build (the Applicant) are seeking planning permission for a proposed mixed-use re-development of an area of land at Kingston Wharf in Shoreham (the Application Site).

1.2 The application site covers an area of land approximately 1.6 hectares in size and falls within Adur District. Adur District Council (who have a combined services arrangement with Worthing Borough Council as 'Adur and Worthing Councils') are the local planning authority.

1.3 The redevelopment of the site is expected to comprise 179 residential apartments (Class C3), within four main blocks, and a mixed-use commercial element of 1no supermarket (Class A1), 1no retail store (Class A1), 1no café (Class A3) and Class B1 Offices.



Site Location Plan

1.4 The Environmental Impact Assessment (EIA) Directive requires that projects that are *likely to have significant effects* on the environment by virtue of their nature, size or location are made subject to an assessment of their environmental effects. **The scale of the proposed development for 179 new homes constitutes, in our opinion, EIA development under**

the EIA Regulations[1]. This is because it meets the definition of a Schedule 2 Development set in the Regulations as an Urban Development Project including more than 150 dwellings (10.b.ii).

1.5 The EIA is a formal process to identify and assess the 'likely significant effects' of the project/development on the environment. The assessment should identify these effects for consideration by the relevant competent authority when considering whether to grant planning permission (in this instance, Adur District Council as the local planning authority).

1.6 The process is set out in the EIA Regulations and national planning practice guidance – these apply the EU *"Directive on the assessment of the effects of certain public and private projects on the environment"* (usually referred to as the 'Environmental Impact Assessment Directive'[2]). These are general requirements for the appropriate identification and assessment of impacts and the content of an Environmental Statement (if required). In some cases, a development may be "screened out" by the relevant competent authority.

1.7 The assessment enables the development to be refined by the project team to minimise possible adverse impacts on the environment and maximise the potential for beneficial outcomes.

1.8 A formal EIA Scoping Opinion can also be requested from the local planning authority to identify what issues need to be considered in an Environmental Statement (and during the formulation of the development proposals) as well as the specific areas where the proposals are likely to result in significant environmental effects. Other key environmental stakeholders and consultees can be involved in this process where necessary.

1.9 The purpose of this EIA Screening Opinion Request Report is to agree with Adur District Council the proposed scope and approach to be adopted within the EIA. The Report summarises the EIA process and scope and assessment methodology. The Report also describes the existing environmental context, the development proposed, identifies potential environmental impacts and assesses the significance of likely effects. As part of this process the EIA also identifies non-significant areas that are proposed to be 'scoped out' of the EIA.

[1] Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended in 2015)
[2] Directive 2014/52/EU (Amending Directive 2011/92/EU)

1.10 Each section of the report will also identify the consultation undertaken as part of pre-application work on the proposals. Measures have been and will continue to be developed in close consultation with relevant consultees, in order to avoid or mitigate potential adverse impacts or identify and accommodate positive environmental interventions.

EIA Content

1.11 The information included in the Environmental Statement will be:

- Description of the application site, its surrounding context and sensitive environmental features and designations – the baseline conditions
- Outline of the environmental factors that have shaped the development proposals and a description of reasonable alternatives considered by the applicant
- The proposed development including the land uses and characteristics of the application scheme and the expected impacts resulting from its operation (including impacts on air quality, light, noise, soil and water)
- A description of aspects likely to be affected by the proposals and the likely significant effects on the environment – both direct impacts and any indirect, cumulative, secondary or temporary impacts resulting from the development
- Mitigation measures to avoid, reduce or offset any significant adverse impacts
- Positive interventions that will benefit the environment

1.12 The contents of the Environmental Statement will be set out across subject-specific technical reports and summarised within an Environmental Statement Non-Technical Summary – setting out the key findings. These reports are:

- Air Quality Assessment
- Biodiversity Survey and Report (including Bat Survey)
- Design and Access Statement
- Drainage Assessment Report
- Energy Strategy Report
- Extended Phase 1 Habitat Survey
- Flood Risk Assessment
- Foul Sewerage Assessment

- Ground Investigation Report
- Heritage Statement
- Land Contamination Assessment
- Landscape Visual Impact Assessment
- Landscaping Strategy
- Light Pollution Assessment
- Noise Impact Assessment
- Refuse and Recycling Details
- Shoreham Harbour Lighting Impact Assessment
- Transport Statement

1.13 Best practice and guidance will inform the entire EIA process including:

- Planning Practice Guidance (DCLG)
- Guidance for Environmental Impact Assessment (DCLG, 2014)
- Amended Circular on Environmental Impact Assessment (DCLG, 2006)
- Design Manual for Roads and Bridges Volume 11: Environmental Assessment (DfT, 2008)

1.14 The assessment will consider the impact of the development against the baseline conditions of the site, as well as the reasonable alternatives considered by the applicant and the rationale for the submitted scheme.

1.15 The EIA will also address the potential impacts of the construction process on environmental receptors and identify the actions taken to avoid, mitigate or offset these impacts, or the vehicles for addressing these in the future (where appropriate). For example, where possible impacts are identified but investigations or operations on site show that further mitigation is necessary, the EIA will set out what should be done in these circumstances and who will be responsible. These details will be set out in relevant appropriate documents such as a Construction Management Plan.

1.16 The EIA will assess the significance of any residual effect on the environment including in terms of the sensitivity of the environmental receptor and the magnitude (likelihood, duration, extent, reversibility and possible mitigation) of the impact. Residual effects will either by classed as significant likely effects or not significant. Once identified these likely

effects will inform the local planning authority in their determination of the planning application.

2.0 SITE AND SURROUNDING CONTEXT

2.1 The site is located within the Western Harbour Arm of Shoreham Harbour, an allocated site within the Adur Local Plan 2017 (Adur Local Plan Policy 8) and Brighton and Hove City Plan – Part One. The application site forms a well-defined parcel of brownfield land, which is available for development.

2.2 The site is roughly rectangular shape and is level grounded. The southern border is bounded by the River Adur and the A259 runs along the northern border of the site. The railway track is located to the north of the site. The Adur Sailing Club as well as residential flats are located south of the site across the River Adur at the far East side of Shoreham beach.

2.3 The character of the immediate locality of the site is predominantly industrial. To the west of the site on is a large industrial waste and scrap metal yard which is currently occupied by 'EMR Shoreham'. To the east is the former Howard Kent Removals site comprising currently of open land where a large warehouse has been recently demolished with open parking area to the east part of the site.

2.4 To the immediate north of the application side are a series of small to medium industrial sheds on the north side of Brighton Road, beyond which lies the Brighton to Portsmouth Railway Line.



The site in context

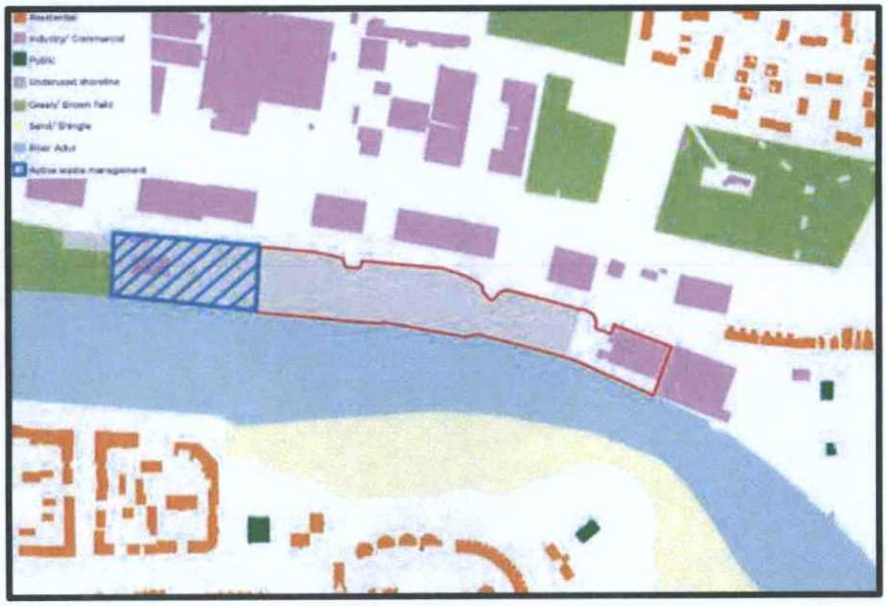
2.5 To the east/northeast of the site there is a linear ground of dwelling houses. The closest dwelling is over 50m from the application site.

2.6 Planning applications at the Free Wharf site (to the west of the site) and the former Howard Kent site (immediately to the east) have been submitted to the Council for residential-led development schemes and these sites also form part of the wider Local Plan allocation.

2.7 Adur Local Plan Policy 8 sets a strategic requirement for the delivery of at least 1,100 new dwellings and 16,000m2 employment generating floorspace across the Western Harbour Arm over the Plan period (to 2032) through the "comprehensive redevelopment" of the area as a mixed-use redevelopment.

2.8 The environmental priorities are to deliver a comprehensive flood defence solution and enhance the natural biodiversity of the area (currently dominated by large industrial uses) through multi-functional greenspaces, improved green infrastructure and the creation and enhancement of habitats.

2.9 The application site is currently used as builder's merchant by "Stamco" and "Day Aggregates" bagging plants, both sites having existing permanent structures. The eastern end of the site is occupied by the "Stamco" building there is also a small structure found to the south-east of the "Day Aggregates" site.



Surrounding Uses

2.10 The application site is not within a Conservation Area and the closest listed building is the Grade II listed Kingston Buci Lighthouse.

2.11 The townscape character of Shoreham is varied and the Council, through pre-application discussions, have identified the only relevant comparator sites within the District as the Ropetackle development and the redevelopment of the former Parcel Force site to the west (currently under construction).

2.12 The nearest nationally designated site is the Adur Estuary to the west and which is designated as a Site of Special Scientific Interest (SSSI) for the presence of tidal mudflats and saltmarsh habitat. In terms of Landscape designations, the South Downs National Park is located approximately 1.57km to the north with the boundary effectively demarcated by the A27. There are no internationally designated sites within 10km of the site, the nearest is the Castle Hill Special Area of Conservation north-east of Brighton (13km).

2.13 The site is located within Flood Zone 3, land with a greater probability of fluvial flood risk (as defined by the Environment Agency). However, the Adur Tidal Walls Project has been proposed by the Environment Agency and was granted planning permission on 1 June 2016. The development at this site has been informed by this flood defence scheme and

in light of these flood attenuation details, the site is suitable for residential development in accordance with the Adur Local Plan allocation.

3.0 PLANNING CONTEXT

3.1 The principle of development is established through the Adur Local Plan 2017 and the emerging Shoreham Harbour Joint Area Action Plan. Adur Local Plan Policy 8 is specifically relevant. It sets the following objectives for the Western Harbour Arm area:

- Deliver at least 1,100 new dwellings and 16,000 sqm employment generating floorspace (including B1 uses)
- Public open space, community uses and small-scale ancillary retail, restaurants and cafes, leisure, and tourism uses will also be provided as part of a sustainable, new waterfront development Sustainability Statement to be provided with all applications, in accordance with guidance note.
- Area priorities for Western Harbour Arm include:
  - To facilitate the comprehensive redevelopment of the Western Harbour Arm (Waterfront) to become an exemplar sustainable, mixed-use area (classes B1 and C3).
  - To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces.
  - To deliver a comprehensive flood defence solution integrated with a publicly accessible riverside route including pedestrian/cycle way and facilities for boat users.
  - To enhance the area's natural biodiversity by incorporating multi-functional green space, creating and improving habitats and improved green infrastructure links.

3.2 Policy 15 of the submission Adur Local Plan (2017) requires new developments to be designed in such a way that they emphasise and enhance the positive qualities of the local neighbourhood, by taking into account local characteristics such as height, scale, bulk and design of existing buildings, impact on skyline, natural and built landmarks and layout of streets and spaces. As well as securing the effective and efficient use of the site, the policy also seeks to ensure that proposals will incorporate an intensity of development appropriate to the locality and/or prevailing townscape. Higher development densities will be particularly appropriate where the site has good public transport accessibility, pedestrian and cycle networks and is close to a range of services and facilities.

3.3 Policy 21 of the Adur Local Plan. This states that on sites of 15 (gross) dwellings or more 30% affordable housing will be sought. The preferred mix of tenure will be 75% social/affordable rented housing and 25% intermediate housing.

3.4 The adopted Planning Contributions for Infrastructure Provision SPD (2013) details a number of infrastructure aims which will be sought through a planning obligation (S106 agreement). It is anticipated that for the proposed development contributions will be required for:

- Open space
- Leisure and sporting facilities
- Education (primary, secondary and 6th form)
- Libraries
- Waste management
- Highways and transport
- Air Quality
- Health Facilities

3.5 The Council's approach to the provision of open space is set out in it's adopted interim planning guidance "*Planning Contributions For Infrastructure Provision*" 2013.

3.6 Policy 28 of the Adur Local Plan requires an impact test for retail proposals with new sales floorspace of 1000 sqm or more.

4.0 PROPOSED DEVELOPMENT

4.1 The application is for a mixed-use Residential-led scheme comprising 179-units of 1, 2 and 3 bedrooms with a semi-recessed parking level and two commercial units comprising an Aldi food store and a mixed-use café, retail and office building.

4.2 The commercial development will provide approximately:

- 2,767m^2 retail floorspace (Use Class A1) across two units (1,824m^2 food store and 943m^2 non-food retail unit)
- 224m^2 café floorspace (Use Class A3)
- 634m^2 office floorspace (Use Class B1)

4.3 Parking facilities will be provided for 303 cars (142 shared parking spaces and 161 residential spaces) and 296 cycle spaces.

4.4 The proposal replaces the existing Stamco warehouse/retail unit and the Day Aggregates builders yard and store.

4.5 The proposed development will comprise of a 4-8 storey residential building, a food store and a mixed use commercial building alongside public realm including a multifunctional riverside walk.

4.6 The Design and Access Statement sets out the range of alternative schemes considered throughout the design process. This sets out a range of environmental considerations including accommodating flood protection, minimising the visual and heritage impact of the proposals and incorporating landscaping and other green infrastructure.

5.0 POTENTIAL ENVIRONMENTAL IMPACTS AND LIKELY EFFECTS

5.1 This section sets out the potential environmental impacts and identifies where the proposed development may result in likely significant effects. It sets out the assessment/s to be undertaken and where necessary the methodology for doing so.

5.2 The EIA and associated technical studies will be carried out in accordance with relevant guidelines, legislation and statutory guidance.

5.3 Some possible impacts should be scoped out of from the EIA (e.g. where likely significant effects are not going to occur as a result of the development). These are topics that have been considered through the EIA process but are considered to be *non-significant issues* and therefore further consideration is not necessary. See Section Six of this Report.

5.4 In summary, the following environmental impacts have been considered in relation to the proposed development:

- Ground conditions
- Heritage
- Visual impacts
- Socio-economic impacts
- Water and flood risk
- Climate change
- Materials
- Construction
- Air quality
- Transport
- Ecology
- Waste
- Lighting
- Aviation
- Electronic interference/telecommunication
- Daylight, sunlight, overshadowing

Ground Conditions

5.5 A Ground Investigation Report will be prepared by Omnia and will accompany the planning application. The Report will provide a full assessment of the ground conditions of the site and will provide an appropriate assessment and recommendations to identify and remediate contaminated land in accordance with statutory guidance.

Heritage

5.6 A Heritage Statement will be undertaken by Beacon Planning and will assess the significance of heritage assets and the potential to be affected by the proposed development. The site itself contains no heritage assets.

5.7 To the east of the site is the Grade II listed Kingston Lighthouse (list entry number 1027897), the Kingston Buci Conservation Area is to the northeast, and the Scheduled Monument Shoreham Fort (list entry number 1005824) is located to the southeast across the harbour.

5.8 The development will form an enhancement to the quality of built development within the settings of the nearby heritage assets and will maintain those positive elements of setting that contribute positively to their heritage significance. The new riverwalk enhances views towards and the experience of Shoreham Fort from across the harbour, increasing the awareness and appreciation of this designated heritage asset.

Visual Impacts

5.9 The Design and Access Statement, and a Landscape and Visual Impact Assessment (LVIA) by Landscape Visual Limited will set out the impact of the development on key views that have been agreed with the LPA during pre-application discussions. The proposal will improve permeability between the site, riverfront and the surrounding area – both in terms of visual and functional connectivity.

Socio-economic impacts

5.10 A socio-economic technical assessment will be prepared by Marshal Regen as part of the Environmental Statement. The assessment will consider the impact of the development

on economic activity, community infrastructure and local and regional economic development as well as the social and economic sustainability impacts of the development.

5.11 In accordance with adopted policy and guidance, a retail impact assessment by Pegasus Panning will assess the impact of the proposed retail store and commercial space on the existing shopping areas od Shoreham and Southwick.

Water and Flood Risk

5.12 The site is located along the western arm of Shoreham Harbour, which forms a key part of the Adur river estuary. The site is considered to be largely located in Flood Zone 3. The online EA maps show the site to be outside any flood risk associated with reservoir flooding and therefore the risk from this source is considered to be very low.

5.13 The flood defences in wider area of Shoreham Harbour are currently being upgraded as part of the Shoreham Adur Tidal Walls Scheme. The redevelopment of the Kingston Wharf site includes rebuilding the harbour wall along this reach and crest levels will be in line with the guidance on hard defences, as per the SPD and JAAP guidance. This provides a benefit to the site and the land behind in reducing the current level of flood risk to the site from overtopping of the existing defences.

5.14 A detailed Flood Risk assessment and drainage strategy will be prepared by HOP Consulting. As a strategic allocation in the Adur Local Plan the site has already passed a Sequential Flood Risk Test for the Local Plan, however an Exception Test will be undertaken to show that the development plans do not represent an increase in the flood risk to the site or other properties. Improvements to the harbour wall and raised levels across the site will reduce flood risk overall.

5.15 In line with the SPD and JAAP, finished floor levels for the residential accommodation will be set at a minimum of 5.77mAOD. This mitigates the predicted 1 in 200-year tidal flood level for the lifetime of the development. External ground levels at the site will be arranged so that any overland surface water flow is directed away from buildings and lower level car park entrances towards underground drainage systems which discharge to the harbour.

5.16 Flood risk to the site generated by high tides and storm surges or a combination of the two are monitored by the Environment Agency and the predictable nature of these events enables some forewarning of potential flood risk. Residents, occupiers and the site management will be signed up the EA's Floodline Warnings Direct service, which will alert site users to potential flood risk and allow time to prepare accordingly.

5.17 Lower parking zones and the food store loading bay area will be appropriately protected against the ingress of groundwater.

5.18 Topographic survey data by MJ Zara Associates (January 2017) indicates that the quay wall crests at a minimum height of 3.82m above Ordnance Datum (AOD). The site slopes gently upwards away from the river towards the A259 with the levels recorded at the site entrances around 4.40mAOD.

5.19 Currently, in addition to public sewer infrastructure, there is an additional private surface water drain serving the Stamco warehouse that discharges to the harbour via a 300mm outfall in the eastern part of the site.

5.20 The site is underlain by an aquifer designated by the EA as a Principal Aquifer, although it is not located within a groundwater Source Protection Zone (SPZ).

5.21 None of the existing drainage infrastructure will be re-used for the new development. Existing on-site drainage is assumed to be redundant for the proposed development given the scale of redevelopment and new discharge arrangements will be established during the design phrase and set out in the Drainage Strategy.

5.22 The proposed land use at the Kingston Wharf development comprises residential and commercial car parks and low traffic roads which represent a low risk of pollution hazard level to water quality (in accordance with CIRIA C753 SuDS Manual). Introducing pollution control and treatment as part of the drainage strategy can result in a significant improvement to the discharging quality of surface water from the site.

5.23 The river wall is to be rebuilt which will further enhance the sustainability of the site. The improvements, upgrades and new infrastructure proposed will also reduce the potential for flood risk offsite.

Climate change

5.24 Increased rainfall intensity, longer storm durations and rising sea levels are all attributed to global climate change. EA guidance states that up to an additional 40% of rainfall intensity to be taken in to account in the design of surface water management. The site-wide surface water drainage infrastructure should be designed to manage the 1 in 100-year storm event with allowance for climate change in accordance with the Non-Statutory Technical Standards for SuDS.

Materials

5.25 The BREEAM assessment for the commercial element of the proposals confirms that:

- All timber to be legally harvested and traded, including FSC/PEFC certification
- Insulation index of >2.5 to be achieved for embodied environmental impact of all insulation within external walls, ground floor, roof and building services
- Materials to be assessed against BRE Green Guide to specification to confirm their ratings
- Where possible, products are to be specified with manufacturer's Environmental Product Declarations (EPDs) as these will enhance the Green Guide ratings achieved
- 80% of all external hard landscaping and boundary protection required to achieve a Green Guide A or A+ rating
- Contractor will be required to provide a Sustainable Procurement Plan setting a clear framework for the responsible sourcing of materials
- All relevant building materials to be sourced from suppliers holding ISO14001/BES6001 product certification

Construction

5.26 The construction process will be controlled through a Construction Management Plan, contents to be agreed with the Council.

5.27 The BREEAM assessment for the commercial element of the proposals confirms that:

- The principal contractor to have a certified Environmental Management System (ISO 14001/EMAS)
- Site-based Sustainability Champion to be appointed
- Contractor to achieve a Considerate Constructors Scheme score of 35+ with a minimum score of 7 in each section
- Site monitoring of energy consumption, water use and transport of materials (fuel consumption and total carbon dioxide equivalent plus total distance travelled)
- A Resource Management Plan (Site Waste Management Plan) will be developed covering non-hazardous waste relating to construction, demolition and excavation

Air Quality

5.28 A detailed Air Quality Assessment will by prepared by MLM.

Transport

5.29 A Transport assessment will consider the implications of the proposed development on the capacity of the local road network, public transport, cycle and pedestrian facilities as well as the wider sustainability of the site.

Ecology

5.30 An Ecological Appraisal produced by The Ecology Partnership will accompany the planning application. This will assess the site's potential to support protected species and

habitats which may be affected by the development proposals and suitable mitigation measures and recommendations.

5.31 The site does not lie within or adjacent to any statutory or non-statutory designated sites. The closest protected area is 415m south separated by the estuary and a residential area. The change in land-use is not considered to increase any indirect negative impacts already felt on these protected areas by the existing levels of traffic and disturbance on site.

5.32 The site consists almost entirely of hardstanding and buildings and has low ecological value for the reasons set out in the Ecological Appraisal

5.33 Some species may utilise the estuary to forage along, however this route is not considered to be impacted by the proposals. A sensitive lighting scheme is recommended.

5.34 The Ecologist has calculated that the change in ecological value of the site will be +0.992 species on a site wide basis.

5.35 Demolition work will be undertaken immediately after a nesting bird check by a suitably qualified ecologist.

5.36 Opportunities to improve the ecological value and potential of the site will be included within the final decision for the development.

Waste

5.37 Each residential core (four in total) will have a designated refuse store at street level. These will be easily accessible from the vehicle access routes for collection by the Council's Local Authority and Waste Strategy Team. Adur District Council waste standards require a total storage provision equivalent to 42,960 litres – the final design will meet these requirements. Separate commercial waste storage space will be identified.

Lighting

5.38 BREEAM Assessment for the commercial element of the scheme states that external lighting will be provided in accordance with BS 5489-1:2013 and BSEN 12464-2:2014.

5.39 Energy efficient external lighting to be specified. Lighting is to have a luminous efficacy of 60 lumens/ watt or greater, controlled through a time-switch or daylight sensor to prevent operation during daylight hours, and presence detection in areas of intermittent pedestrian traffic.

5.40 A Light Pollution Assessment prepared by GIA will assess the impact of the development, particularly with regard to the conspicuity of navigation light from the nearby lighthouse and serving the Harbour. No adverse environmental effects are anticipated.

6.0 NON-SIGNIFICANT ISSUES

6.1 The EIA should ensure that the assessment is proportionate and focused on the likely significant effects of the proposed development identified. There are therefore other potential environmental issues that are not likely to be significantly affected by the development and we propose that these effects are 'scoped out' of the Environmental Statement.

Daylight, sunlight and overshadowing

6.2 The heights of the proposed buildings have been significantly reduced as part of an iterative design process and the distribution of mass has been thoughtfully considered to ensure the proposed buildings sit appropriately within their context.

6.3 The site is 50m from the nearest residential properties to the north-east. Due to the proximity of these homes to the application site the development is not considered to have a significant impact on daylight, sunlight or overshadowing of these properties. None of the adjacent commercial buildings have windows facing the application site.

Electronic interference/telecommunication

6.4 The proposed development is not considered to have significant environmental effects in relation to telecommunication interference.

Aviation

6.5 The final height and massing of the development is not considered to cause an aviation concern or have the potential for any related environmental effects, however if the Civil Aviation Authority have specific concerns in relation to the application then these can be addressed accordingly.

7.0 CONCLUSION

7.1 This screening opinion request report includes the necessary information for concluding on the significant effects of the proposed development on the environment or directs the decision-maker to the relevant reports that will contain this information.

7.2 The Screening Opinion request satisfies the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It summarises the key considerations of the EIA process and shows the approach that will be adopted for the proposed development at Kingston Wharf.

7.3 This report requests a screening opinion from the local planning authority. It sets out an identification and assessment of environmental impacts from the proposed development and the content of a future Environmental Statement (if required).

7.4 If this report provides sufficient information with which the local planning authority can 'screen out' the proposed development, then we request that it issues a screening opinion stating so. Should an Environmental Statement be required then we request confirmation from the local planning authority that the contents of any such Environmental Statement should be as described in this Report.

Lewis & Co Planning
February 2018