

Zoe Simmonds
Lichfields
14 Regents Wharf
All Saints Street
London
N1 9RL

Please ask for: James Cross
Email: james.cross@arun.gov.uk
Telephone: 01903 737784
Our Ref: BEE/99/20/EIS
Your Ref:
Date: 15 October 2020

Dear Zoe

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – Scoping Opinion

I write with reference to the above submission made on Monday 31 August 2020. You will have seen the full consultation responses to this request on the Council's website already and I do not propose to provide these again but they should be read as attachments to this letter. I have attempted to summarise these comments but please refer to these in full as well, as they provide more detail concerning the content and scope of the EIA and the contents of the ES. Below I set out the Council's formal Scoping Opinion.

Proposal	<i>Scoping opinion request relating to 2500 new homes, up to 3.52ha of employment land, a 3 Form Entry primary school, 2 local centres and associated infrastructure across approximately 141 ha of land.</i>
Site Address	Land West of Bersted
Applicant	Lichfields on behalf of the Church Commissioners for England and Landlink Estates
Reference	BEE/99/20/EIS
Date	15 October 2020

1. Classification of the proposed development and the requirement for an Environmental Impact Assessment

- 1.1 The current Regulations are the Town and Country Planning (EIA) Regulations 2017 which came into force on 16 May 2017. These were amended by the Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 which came into force on 01 October 2018 (together the '2017 EIA Regulations'). The EIA Scoping submission confirms the subsequent ES will be prepared with regard to the 2017 EIA Regulations.
- 1.2 The development falls within Part 10(b) of Schedule 2 of the 2017 Regulations as an urban development project which includes more than 150 dwellings.
- 1.3 For Schedule 2 developments, the 2017 Regulations require that an EIA is undertaken where development is *likely to have significant effects on the environment by virtue of factors such as its nature, size and location*.
- 1.4 Schedule 3 of the 2017 Regulations goes on to identify the characteristics of the development, the sensitivity of the location and the characteristics of the potential impact as the key 'Selection Criteria for screening Schedule 2 development'. In light of these, EIA will be required for Schedule 2 development in three main types of case:

1. Major development which is of more than local importance;

2. Developments located in particularly environmentally sensitive or vulnerable locations; and
3. Developments with unusually complex and potentially hazardous environmental effects

- 1.5 It is considered that the development should be subject to EIA to ensure that any likely significant effects can be identified, and mitigation and monitoring measures specified as required. This has also been confirmed in the West Bersted scoping opinion issued by Arun District Council dated 26 June 2017.

2. Scoping Opinion Issued June 2017

- 2.1 Arun District Council issued a previous scoping opinion dated 26 June 2017 which was submitted by the same applicants as this EIA Scoping Opinion. Due to the passage of time and the publication of the new EIA Regulations (in 2017 and consolidated in 2018), this Scoping Report has been submitted to clarify the scope of the EIA and specify the proposed approach to the EIA for West Bersted based on additional work at the site.

3. The Site

- 3.1 The site comprises flat, actively farmed arable land that is subdivided into large irregular fields by hedgerows and ditches. The site includes three public rights of way; footpaths 137-1, 134-5 and 136-1. These generally follow the line of the hedgerows and ditches. A number of roads abut the site boundary, but none cross the site. An access track to Park Farm also runs along the site boundary to the west.
- 3.2 The site lies within the allocated SD3 West of Bersted Strategic Development Site as defined in the Arun Local Plan. The site lies within the 'Strategic Gap' as defined in the Bersted Neighbourhood Plan (November 2014).
- 3.3 The Environment Agency (EA) flood maps show that the site is wholly situated outside of any Flood Zones and as such is not classified as being at risk of flooding by main rivers or tidal sources. There is a high water table and as such, there is a higher risk of groundwater flooding.
- 3.4 Agricultural land on site comprises predominantly (65%) of sub-Grade 3a land with areas of Grade 2 (22%) and sub-Grade 3b (6%). The remainder of the site comprises non-agricultural/other land which includes areas of farm buildings, tracks etc.
- 3.5 There are no Scheduled Monuments, Conservation Areas or Listed Buildings within the site, though there are designated heritage assets in the wider locality in excess of 500m from the site.
- 3.6 There are six internationally designated sites within 15km of the site boundary. These comprise the Bognor Reef Site of Special Scientific Interest (SSSI) which is located 2km south of the site. The Pagham Harbour Special Protection Area (SPA)/Ramsar Wetlands Site lies approximately 3.6km south-east of the site boundary. The site therefore falls within the 5km zone of influence of the SPA designation.
- 3.7 There are no Air Quality Management Areas (AQMA) in the District of Arun; however, three are located in the neighbouring District of Chichester. Those AQMAs located in close proximity comprise Stockbridge Roundabout and St Pancras at approximately 5.25km from the site.
- 3.8 There are no formal landscape designations that cover the site. The South Downs National Park lies approximately 5.5km to the north of the site.

4. Proposal

- 4.1 The description of development is anticipated to be:

Outline application, with all matters reserved except for access, for mixed use development including residential, business, education facilities, retail, food & drink & financial & professional services, leisure & recreation uses, community uses, open space, highway works & transport measures, landscaping, improvements to public realm & other ancillary works.

- 4.2 The proposal includes connections to the local road network from the Lower Bognor Road, Chalcraft Lane and to the A259 Chichester Road. A spine road would be provided within the site, extending the North Bersted Bypass to the western parts of Bognor Regis.
- 4.3 The Scoping Report provides additional details on the proposed development, including the assumption that around 150-200 dwellings per year would be built, taking a total period of 11 years.
- 4.4 A red line plan has been submitted in Appendix 1 which identifies the land subject of the EIA Scoping Opinion. A Framework Masterplan for the wider site allocation is included in Appendix 2.

5. Scope of the Environmental Statement

- 5.1 Every Environmental Statement (ES) must provide a full factual description of the development, and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise. The ES should, wherever possible, avoid the use of jargon and be written in plain English.
- 5.2 Every ES must also contain all of the information set out in Part 5 of Schedule 18 to the EIA Regulations, along with such information from Part 18(3) as is reasonably required to assess the effects of the projects. The ES should therefore contain:
 - A full description of the development;
 - Measures to avoid/reduce/remedy significant adverse effects;
 - Data to identify and assess the main environmental effects;
 - An outline of the main alternatives, options and sites considered; and
 - A non-technical summary
- 5.3 The following sets out Arun District Council's views as to what main/significant areas will need to be considered within any forthcoming ES. It does not prevent Arun District Council from further requests for information at a later stage, if deemed necessary.

Landscape & Visual Impact

- 5.4 Natural England has provided advice on the scope of the ES in relation to Landscape and Visual impacts. ADC has provided advice under separate cover on the location of the proposed viewpoints that will form the basis of the visual impact assessment.
- 5.5 The viewpoints confirmed in this separate correspondence should be incorporated into the supporting Landscape, Visual Impact Assessment within the supporting ES. The NE response emphasises that they support the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out should be applied for the purposes of the LVIA submission contained within the supporting ES report.
- 5.6 The NE response highlights that:
 - The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping Stage.

- 5.7 ADC will require the Landform development (and any other land within the strategic allocation outside of the control of the applicant) to be given consideration; subject to relevant information being available.
- 5.8 Subject to the above, and the comments set out in the NE response found on the EIS Scoping file, the scope of the Landscape Character and Visual Impact Assessment is agreed.

Ground Conditions and Contamination

- 5.9 Environmental Health have not provided comments in respect of this EIA Scoping opinion. However, as the baseline conditions are understood to have remained the same since the 2017 report, ADC consider the conclusions to remain valid and relevant.
- 5.10 Under the 2017 Scoping Report Environmental Health noted the site comprises mainly greenfield development and indicated that no significant contamination was present. They agree that further ground investigation maybe undertaken on a phase by phase basis during the construction phase. The LPA supports this approach and will require incorporation of this commitment within the ES.
- 5.11 The Environment Agency, in 2017, also commented that they support the inclusion of this Section. The LPA maintains that the Environmental Statement shall identify all risks from contamination and ensure that appropriate action, including remediation where necessary, will be taken to address these risks. The LPA is content for this to be undertaken on the basis of the reports detailed in the EIS Scoping submission.
- 5.12 Subject to the above, and the comments set out in the EIS Scoping file, the scope of the Ground Conditions and Contamination is agreed.

Noise, Vibration, Air Quality and Dust

- 5.13 Environmental Health, in 2017, recommended the applicant takes into account the Sussex Air Quality Guidance and the Sussex Noise Advice Document. As no changes have occurred in the baseline studies underpinning this EIS Scoping submission ADC considers the subsequent ES should take into account the above documents, or any document in succession.
- 5.14 The LPA will require the ES to demonstrate work undertaken in consultation with the Environment Agency to consider the in-combination effects on the Pagham Harbour SAC/SPA/Ramsar site deriving from nitrogen deposition from road traffic.
- 5.15 The ES will need to encompass consideration given to the in-combination impacts on the AQMA's located within Chichester District Council's authority. Arun District Council's Environmental Health Team can assist in agreeing the scope of consideration to be given within the subsequent ES, in consultation with CDC's Environmental Health Team.
- 5.16 Subject to the above, and the comments set out in the EIS Scoping file, the scope of Noise, Vibration, Air Quality and Dust is agreed.

Hydrology, Flood risk and Drainage

Foul & Surface Water Drainage

- 5.17 The comments received from Southern Water in respect of foul drainage highlight:
- Due to the size of the development and to protect the premises from the impact of sewage flooding, an assessment is required to ascertain an appropriate point of connection to the foul and surface water sewerage network
 - Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer

- In situations where surface water is being considered for discharge to our network, we require the below hierarchy for surface water to be followed which is reflected in Part 3 of the Building Regulations

- 5.18 The 2017 Scoping Opinion detailed that Southern water's current sewerage/water records do not show any public sewers to be crossing the site, however due to changes in legislation that came into force on 01 October 2011 regarding the future ownership of sewers, it is possible that a sewer/s now deemed to be public could be crossing the above property.
- 5.19 The 2017 Scoping Opinion noted that ADC Drainage Officers have referred the applicants to the relevant pages of the Arun Strategic Surface Water Management Study (October 2016) which provides a framework and recommendations for surface water drainage at strategic sites. It includes information about the issues on the site, which include surface water flooding, waterlogging and high groundwater levels. The next steps and recommendations section of the Stage 3 report identifies actions which should be addressed through the ES as part of the FRA.
- 5.20 The EIS Scoping Opinion does not confirm whether the site falls within either a Nitrate Vulnerable Zone (NVZ) or Source Protection Zone (SPZ). Should further studies conclude that the site would affect any of these zones the ES should incorporate mitigation to be agreed with Southern Water and/or Natural England in respect of any impacts. Such impacts, if any, should take into account in-combination effects.
- 5.21 Subject to the above, and the comments set out in the EIS Scoping file, the scope of Hydrology, Flood Risk and Drainage is agreed.

Flood Risk/Water Environment

- 5.22 No consultation response from the Environment Agency has been received on the date of this response. However, the 2017 Scoping Opinion response contained advice which is equally as applicable to this response. This advice is as follows:
- The site lies within Flood Zone 1, however, due to the size of the site a Flood Risk Assessment (FRA) will need to be submitted as referenced in the Scoping Report
 - The FRA will be assessed by West Sussex County Council, as the Lead Local Flood Authority (LLFA) and we recommend that you consult with them on any specific requirements for the FRA and the Environmental Statement. The FRA for this site, particularly with regards to the drainage strategy will be a major consideration. There are high groundwater levels, poor permeability soils, and a limited number of watercourses available for disposal of surface water and a flat topography. Groundwater monitoring will be required as part of the drainage study.
 - It is also noted that within the site boundary, there are existing above ground reservoirs, used for irrigation purposes. An assessment of these reservoirs as part of the FRA will be needed, both in terms of their future use, present safety and should the embankments fail, the route and depth of flooding determined.
 - We would also recommend that a flood risk and drainage masterplan for the entire site is produced and not one that makes assessments based on development phases.
 - Revisions to climate change allowances came into force on 19 February 2016. When undertaking FRA's, surface water run-off calculations should be assessed based on a 1 in 100 year flood event plus 20% for design and 40% for exceedance events. For fluvial flooding 45% should be added to the 1 in 100 flood.

- 5.23 Subject to the above points being included within the relevant sections of the ES then the Scope is agreed as set out in the Scoping Report.

Archaeology and Cultural Heritage

- 5.24 The 2017 Scoping Opinion concluded that the ADC Archaeologist has provided comments agreeing that the Environmental Statement should include an assessment of archaeology and cultural heritage as outlined in the Scoping Report. It is likely that any areas not already archaeologically evaluated will need to be investigated ahead of redevelopment.
- 5.25 In relation to listed building, the 2017 Scoping Opinion concluded that the Scoping Report identifies the buildings which will need to be assessed in relation to their settings and the ADC Historic Buildings Officer has confirmed that the Scope set out is satisfactory.
- 5.26 The Scoping Report and proposed methodology remains the same between the 2017 EIA Scoping submission and this current submission. This is confirmed in updated comments from ADC's Archaeologist. There has been no change in baseline conditions and therefore the above recommendations remain valid.
- 5.27 Subject to the above points being included within the relevant sections of the ES then the Scope is agreed as set out in the Scoping Report.

Socio-economics

- 5.28 The Environmental Statement should include an assessment of the potential impacts of the proposed development on the recreational value of the area, together with impacts on the community living and working within the locality. This should also be linked to the cumulative impacts section. ADC will require consideration to be given to impacts on healthcare and education within the District.
- 5.29 Subject to the above, and the comments set out in the EIS Scoping file, the scope of Socio-economics is agreed.

Ecology and Nature Conservation

Biodiversity

- 5.30 In relation to biodiversity, the comments from the Natural England have been received which reiterate those advised within the 2017 Scoping opinion. They conclude that:
- We broadly support the proposed methodology set out in the Scoping Report. We also support the inclusion of a Construction Environmental Management Plan for the construction phase in order to reduce adverse effects on species and habitats
 - We agree with the proposed biodiversity survey list and as part of our remit have particular interest in the results of surveys for wetland species such as GCN and water vole. As we are principally concerned with these wetland species, we would want to see that there is no loss of wetland habitat in the form of ditches, ponds or wetland features as a result of the development. Justification must be given for any loss and we would expect at least like for like compensation should this be the case.
 - Existing Nature Conservation features currently found within the site such as mature trees, hedgerows and watercourses should be retained wherever possible and incorporated into the site design in order to retain a continuous corridor for wildlife throughout the development. We would wish wildlife considered through the design of the drainage strategy and for this to take opportunities to ensure it is beneficial for wildlife.
 - On a site as large as this, opportunities for enhancement to the natural environment and the provision of green infrastructure should be considered at an early stage.

- 5.31 The Local Planning Authority is satisfied that the updated EIA Scoping submission does not affect the previous 2017 comments which remain applicable on the date of this response.
- 5.32 Natural England (NE) and ADC Ecologist have provided detailed comments which can be found on the EIS Scoping file. These comments include the general principles of what an ES should include (as set out in Schedule 4 of the Regulations). These include:
- Full ecological surveys for the site including, phase one habitat surveys and subsequent protected species surveys
 - Full winter bird surveys
 - Full mitigation strategies for any species found onsite
 - Considerations and safeguarding of green infrastructure and connectivity across the site – (hedgerow and tree connectivity)
 - Habitat enhancements on site
 - Assessment of the direct and indirect impacts on Pagham Harbour SPA
 - Impacts from climate change and planning for the future
 - How the site will achieve Biodiversity Net Gain
- 5.33 The above comments also refer to the importance of any assessments considering the potential cumulative effects of the proposal and in-combinations effects.
- 5.34 They recommend that the potential impact of the proposal upon features of nature conservation interest and opportunities should be included within the ES in accordance with the Guidelines for Ecological Impact Assessment developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).
- 5.35 NE also identify the need to assess the potential of the proposal to affect designated sites and if a likely significant effect on a European site is identified or uncertain then the LPA may need to prepare an Appropriate Assessment.
- 5.36 An Appropriate Assessment has already been undertaken at Local Plan level but will also be undertaken by the decision taker when the application is received. NE provides detail on what should be included in a report to inform a Habitats Regulation Assessment, which can form part of the ES in order to assess the direct and indirect impacts on the Pagham Harbour SPA.
- 5.37 NE identifies the potential loss of functionality linked habitat which needs to be considered in relation to brent geese. They also advise on the design of greenspace to reduce pressure on Pagham Harbour. This advice should be incorporated into mitigation measures.
- 5.38 NE advises that a habitat survey (equivalent to Phase 2) is carried out on the site in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The NE response sets out a criteria regarding what should be incorporated in the ES to address this. The LPA will require the submission of this detailed information within the supporting ES.
- 5.39 The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals and strategies for full mitigation of any impacts and if appropriate, compensation measures. In relation to Protected Species surveys these should be carried out at the optimal time of year as set out in the NE advice and should include Phase 1 habitat surveys and subsequent protected species surveys. These should include full winter bird surveys. The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the Natural England Biodiversity List, published under the requirements of S41 of the Natural

Environment and Rural Communities (NERC) Act 2006. The NE advice provides further detail. The potential for habitat enhancements on site should also be included.

5.40 The updated comments from NE also detail the requirement to detail measures to achieve at least 10% minimum biodiversity gains. The response emphasises that:

- NE are advocating for Local Planning Authorities and developers to go beyond this mandatory minimum wherever possible. On a development of this size with the amount of proposed green/blue space, we believe this would certainly be possible and therefore advocate going beyond the 10% minimum. We advise you follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced and then what new features could be incorporated into the development proposal.
- Whilst details on the mandatory approach are being finalised, it is indicated that the use of the Biodiversity Metric will likely be mandated. Further information on the current realisation of the metric can be found here. The biodiversity metric is a useful tool to help developers calculate net gain and we advise use of this metric to inform proposals for this development.

5.41 Subject to inclusion of the issues set out above (and as detailed in the Natural England comments in full, found on the EIS Scoping file) the Scope of Ecology and Nature Conservation is agreed.

Agricultural Land

5.42 The EIS submission details the effects on the proposed development in terms of agricultural land quality and the agricultural businesses that operate within the site will be included within the subsequent ES. Consideration should also be given to the surveys undertaken at Local Plan stage which considered the loss of agricultural land.

5.43 Subject to inclusion of the issues set out above in the EIS Scoping file, the Scope of Agricultural Land is agreed.

Transport and Access

5.44 The Local Highway Authority, within the 2017 Scoping Opinion, advised that the impact on the local highway network should be reviewed as part of the transport assessment (TA). The scope of the TA which can form part of the ES has been identified in the Scoping Report. The TA which should be incorporated into the ES should be agreed with West Sussex County Council acting as the Local Highway Authority, prior to their submission. Subject to agreement with WSCC Highways, ADC agree the scope of the TA.

5.45 Comments have been received from Highways England acting in their capacity of overseeing the Strategic Road Network. Notwithstanding the totality of their comments, the LPA will expect consideration of Chichester District Council's Local Plan proposals (plus committed development) and the agreed necessary junction mitigations on the A27, coupled with the cumulative impacts of Arun's committed development and that from its adopted Local Plan. It will be necessary to undertake the assessment at the end of both Local Plan period which is currently 2031 as well as year of opening at full occupancy.

5.46 As set out in the updated Scoping Report, the TA should be incorporated as a chapter within the ES and should link in with the cumulative impacts section of the ES. It is agreed that the junctions listed on page 16 (Table 5.3) of the updated Scoping Report should be taken into account in terms of cumulative impacts. Within the 2017 Scoping Opinion WSCC recommended that the employment uses at Enterprise Bognor Regis should be incorporated. This remains the case in this response.

5.47 Subject to inclusion of the issues set out in the above EIS Scoping file, and the comments received from WSCC in 2017 and Highways England in this submission, the Scope of Transport is agreed.

Items Falling Outside the Scope of the Environmental Statement: *Daylight, Sunlight and Overshadowing*

5.48 The 2017 Scoping Opinion issued by ADC agreed the parameters for this matter. However, this EIS Scoping submission seeks to scope out daylight, sunlight and overshadowing on the basis that:

- The existing site comprises flat, arable land subdivided into large irregular fields by hedgerows and ditches, and existing properties surrounding the site are limited to a small number of properties to the south east and north east of the site. For the reasons it is not considered that there is any likelihood of adverse impacts in terms of daylight and overshadowing on existing properties.
- Lowest level windows within the residential accommodation have been considered in terms of acceptable levels of light, ability to maximise sunlight and passive solar energy in accordance with local policy. This will be explained within the Design and Access Statement to be submitted in support of the planning application.
- Proposed areas of open space and amenity space adjacent to and within the development have been considerably design in terms of overshadowing.
- Given the above reasons, and the scale of the development, it is not envisaged that the development will give rise to any materially adverse daylight and sunlight effects.

5.49 ADC considers such an approach to be reasonable and adequate controls will exist within the supporting submission documents to fully consider impacts on daylight, sunlight and overshadowing. Therefore, subject to the above inclusions within the Design and Access Statement, daylight, sunlight and overshadowing can be scoped out.

Items Falling Outside the Scope of the Environmental Statement: *Access, Recreation and Green Infrastructure*

5.50 The 2017 Scoping Opinion issued by ADC identified consideration of access, recreation and green infrastructure to fall within the scope of the ES. This EIS Scoping submission seeks to scope out this matter on the basis of:

- Access will be addressed as part of the transport and accessibility assessment.
- Recreation and green infrastructure will be considered in both the socio-economic assessment and landscape and visual impact assessment.
- To avoid duplication and ensure a proportionate approach it is considered that a technical aspect chapter dealing with access, recreation and green infrastructure is unnecessary as matters are addressed elsewhere within the ES.

5.51 ADC considers such an approach to be reasonable and adequate controls will exist within the supporting submission documents to fully consider the impacts on access, recreation and green infrastructure. Therefore, subject to the above inclusions in the detailed documents, access, recreation and green infrastructure can be scoped out.

Items Falling Outside the Scope of the Environmental Statement: *Sustainability and Climate Change*

5.52 The 2017 Scoping Opinion issued by ADC agreed to Scope out this matter. This EIS Scoping submission seeks to continue to scope out Sustainability and Climate Change on the basis that:

- The development will ensure that the relevant sustainability standards are adhered to throughout the project, and reduction in CO2 levels will be achieved through energy efficiency measures incorporated into the scheme design.
- Elements such as water consumption will be restricted through design measures and this will be considered fully in the water environment chapter of the ES.
- The Transport chapter will cover issues relating to transport, i.e. the use of sustainable and public transport within the development.
- Other specific sustainability measures are identified as part of the development parameters (e.g. specific energy proposals) will be considered throughout the ES in relation to other technical chapters.
- Other specific sustainability measures are identified as part of the development parameters (e.g. specific energy proposals) will be considered throughout the ES in relation to other technical chapters.
- Information on sustainability will be included as part of the Design & Access Statement and a standalone Sustainability and Energy Statement to be submitted with the planning application.

5.53 ADC considers the matter of Sustainability and Climate Change will be successfully covered in the relevant technical chapters of the ES. Whilst they are not technically “Scoped Out”, ADC considers that subject to their inclusion within the relevant technical chapters, a specific chapter on Sustainability and Climate Change will not be required. The ES non-technical summary should explain this approach and signpost where sustainability and climate change matters are considered.

Items Falling Outside the Scope of the Environmental Statement: *Waste and Recycling*

5.54 The 2017 Scoping Opinion issued by ADC agreed to Scope out this matter. For the reasons set out in the EIS submission, ADC considers that this matter can remain Scoped out.

Items Falling Outside the Scope of the Environmental Statement: *Energy and Utilities*

5.55 The 2017 Scoping Opinion issued by ADC agreed to Scope out this matter. For the reasons set out in the EIS submission, ADC considers that this matter can remain Scoped out.

Items Falling Outside the Scope of the Environmental Statement: *Human Health*

5.56 The 2017 Scoping Opinion issued by ADC agreed to Scope out this matter. For the reasons set out in the EIS submission, and subject to impacts on demand for healthcare facilities being given consideration in the socio-economics chapter, ADC considers that this matter can remain Scoped out.

Items Falling Outside the Scope of the Environmental Statement: *Risk of Major Accidents and Disasters*

5.57 The 2017 Scoping Opinion issued by ADC agreed to Scope out this matter. For the reasons set out in the EIS submission, ADC considers that this matter can remain Scoped out.

Cumulative Impacts

5.58 The Environmental Statement should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and

activities that are being, have been or will be carried out. To carry out the assessment of cumulative and in-combination effects, the following types of projects should be included (subject to availability of information):

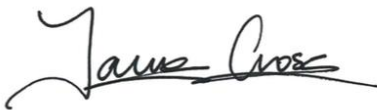
- i. Existing completed projects
- ii. Approved but uncompleted projects
- iii. Plans or projects for which an application has been made and which are under consideration by the consenting authorities
- iv. Plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects

5.59 The main applications and proposals have been identified within the Scoping Report but any additional schemes that may arise after this Opinion is issued may also need to be added into the cumulative impacts.

Summary & Conclusions

I trust the above provides you with sufficient information of the requirements for the form of Environmental Statement submission. However, if you require any further information please feel free to contact me on the details provided below.

Kindest regards,



James Cross Bsc (Hons) MSc Lcgl TP. MTPI
Strategic Development Sites Project Officer

T: 01903 737784

E: james.cross@arun.gov.uk

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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