

SCREENING OPINION

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

Screening Opinion reference: SR/17b

Applicant: Britaniacrest Recycling Limited

Agent: SLR

Date Received: 16 August 2017

Site: Washington Sand Pit, Hampers Lane, Storrington, West Sussex, RH20 4AF

Proposal: Variation of conditions 2, 3 and 27(b) of planning permission WSCC/104/13/SR to allow for mineral extraction to continue until the end of 2019.

In May 2015, planning permission was granted for the continuation of mineral extraction for a two year period and the importation of inert material over a five year period, to enable the restoration of mineral working at Washington Sandpit (ref. WSCC/104/13/SR). Condition 2 of that permission required that all operations shall cease and the land be restored in full not later than 5 years from the commencement of the development.

Importation of materials began in May 2015, effectively providing two years of mineral extraction (until 1 May 2017) and five years for the completion of restoration (by 1 May 2020).

The applicant now proposes that mineral extraction continue until the end of 2019 to maximise the recovery of available sand reserves, which would still enable the development to be completed within the originally permitted timescales of 1 May 2020. This would require a S73 planning application to vary the conditions of the current permission, to which the following Screening Opinion relates.

In summary the proposed development proposes the following variations/amendments;

- Condition 2 be varied to read *“The development hereby permitted will enable sand extraction to continue until 31 December 2019 and for the site to be restored in accordance with the scheme approved under condition 12 of planning permission WSCC/104/13/SR by the 1 May 2020;*
- *Condition 3 to be updated by a revised set of phasing plans; and*
- *Condition 27 (b) to be deleted.*

Classification of the Proposed Development

The proposal does not comprise Schedule 1 development, as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (‘the EIA Regulations’). The application submitted in respect of the currently approved development proposals (WSCC/104/13/SR) was accompanied by a voluntarily-submitted EIA as it was considered to be a proposal which would fall within

Schedule 2, Part 2(a) Extractive Industry – ‘*Quarries, open cast mining and peat extraction*’. The Screening threshold set out in column 2 to Schedule 2 for such development includes ‘*all development except the construction of buildings or other ancillary structures where the new floorspace does not exceed 1,000 square metres*’.

The present development proposals are considered to fall within Schedule 2 to the EIA Regulations, namely Part 13(b) as it relates to a ‘*change to or extension of development of a description listed in paragraphs 1 to 12 of Column 1 of this table (Schedule 2), where that development is already authorised, executed or in the process of being executed.*’

As a result of the above, with reference to Schedule 3 to the EIA Regulations, consideration needs to be given as to whether the proposed variations/amendments to the approved development, along with the existing, approved development has the potential to result in ‘significant environmental effects’ which require an EIA’.

Characteristics of Development	
Development Area	The site occupies an area of approximately 6.5 hectares.
Nature / Scale / Design of Whole Development	<p>The proposed development would result in an extended duration of mineral extraction which would continue to take place concurrently with extant inert fill/restoration activities.</p> <p>The development would not result in any increased volume of sand extracted, area developed, nor extend the period to complete final restoration of the site.</p> <p>There is some potential for impact upon the phasing of the site which includes a progressive extraction and restoration (via infill).</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
1. Will the development involve actions that will cause physical changes in the locality (topography, land use, changes in waterbodies etc.)?	<p>Likely. The proposals relate to the extraction of sand and subsequent restoration through importation of inert waste to infill the resulting void.</p> <p>The final landform would change from a deep steep sided quarry void to a feathered depression infilled and restored for informal countryside recreation uses (e.g. Permissive footpaths/Country Park).</p>	<p>No. While the topography of the area would change, the impact on the wider area is not considered to be significant. The restoration of the site would result in a landform suitable for countryside recreation and be integrated into the neighbouring Country Park. This is considered to be beneficial in terms of impact on people and the environment.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>2. Will the development use natural resources such as land, soil, water, biodiversity, materials, or energy, especially resources that are non-renewable, in short supply or have low capacity to regenerate?</p>	<p>Likely. The proposed development would involve the extraction of sand and the use of inert material/soils for restoration.</p>	<p>No significant resource use anticipated.</p> <p>The proposals, as amended, would not alter the current operational practices or the final extent/volume of extraction/fill permitted.</p> <p>The proposals seek to ensure that finite minerals are not sterilised at a site with established infrastructure.</p>
<p>3. Will the development involve the use, storage, production of substances or materials that could be harmful to people or the environment?</p>	<p>Limited. The development proposals involve the importation of inert waste only.</p> <p>Site operations involve the storage of some fuels/oil for plant use in plant and sanitary waste from site employees.</p>	<p>No significant effects anticipated given complementary Environmental Permitting regime. Operational practices would remain consistent with established operations at the site which are not known to have resulted in significant environmental impacts.</p>
<p>4. Will the development produce significant volumes of wastes during construction, operation or decommissioning?</p>	<p>Unlikely. At worst approximately 5% of waste materials brought to site may be rejected and require disposal off site, as is currently the case.</p>	<p>Significant volumes of waste not anticipated.</p>
<p>5. Will the development give rise to significant noise, vibration, light, dust, odours?</p> <ul style="list-style-type: none"> - during construction - during operation 	<p>Likely.</p> <p>Earthmoving/extraction operations and associated processing may give rise to some noise/dust impacts.</p> <p>HGV volumes associated with concurrent extraction and infill would continue over a longer period than originally envisaged (4 rather than 2 years).</p>	<p>No significant impacts anticipated taking into account established mitigation that is secured by condition (which includes controls over hours of operation/noise limits and operational noise/dust management measures).</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>6. Does the proposal have the potential to release pollutants to air, land, or water?</p>	<p>Possible if not appropriately controlled.</p> <p>Proposals include the importation of waste into a site with high permeability and with links to a Principal Aquifer.</p> <p>No change from existing operations which included a Hydrological Risk Assessment and programme of monitoring.</p>	<p>No significant effects anticipated given previous reviews and established mitigation/monitoring and Environmental Permit requirements.</p>
<p>7. Are there areas on or around the location that are already subject to pollution or environmental damage – e.g. where existing environmental standards are exceeded, which could be affected by the project?</p>	<p>Possible.</p> <p>Historic Landfill site located within the site.</p> <p>Due to traffic emissions Storrington Village (approx. 2km west) has been designated as an Air Quality Management Area. To avoid impacts on air quality all site traffic, is directed away from the village to/from the east (controlled by S106 legal agreement).</p>	<p>No significant effects anticipated.</p> <p>No physical works proposed in former landfill area (specifically prohibited by condition) and established groundwater monitoring ensures ongoing review.</p> <p>AQMA unlikely to be affected as vehicles avoid it, and no additional vehicles proposed.</p>
<p>8. Is there a high risk of major accidents and/or disasters, including those caused by climate change, during construction or operation of the development that could have effects on people or the environment?</p>	<p>Unlikely. Operations do not pose significant risk in terms of major accident or disaster.</p>	<p>No significant effects anticipated.</p>
<p>9. Will the project result in social changes e.g. demography, traditional lifestyles, employment?</p>	<p>Unlikely. No changes anticipated.</p>	<p>No significant effects anticipated.</p>
<p>10. Will the development pose significant risks to human health, for example due to water contamination or air pollution?</p>	<p>Unlikely.</p> <p>Controls in place to ensure sensitive water bodies are not affected. Dust controlled by existing management regime.</p> <p>Air emissions limited to those associated with HGV movements which are directly onto a major road and comprise a low number of overall traffic volumes.</p>	<p>No significant effects anticipated given existing planning requirements.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>11. Are there areas on or around the location that are protected under international, national or local legislation for their ecological, landscape, cultural or other value that could be affected by the project?</p>	<p>The South Downs National Park (SDNP) lies to the south of the A283 which forms the southern boundary of the site.</p> <p>No change from existing operations proposed.</p>	<p>No significant effects anticipated given established quarrying/fill operations. No changes to approved final restoration scheme or completion date proposed.</p>
<p>12. Are there any other areas around the location that are important for their ecology e.g. wetlands, riparian areas, river mouths, mountains, forests, coastal zones, the marine environment, nature reserves and parks that could be affected by the project?</p>	<p>Site not statutorily designated for ecological reasons.</p> <p>Sandgate Country Park lies to the north of the site and upon completion the required quarry would form part of this. The proposed restoration of the site seeks to enhance recreational and ecological benefit of the site.</p> <p>Approximately 300m to the northwest of the site (within Sandgate Country Park) is Heath Common – Site of Nature Conservation Importance (SNCI). Limited potential for impact.</p>	<p>No significant effects anticipated.</p>
<p>13. Are there any areas on or around the location that are used by protected or sensitive species of fauna or flora that could be affected by the project?</p>	<p>Unlikely. Application site includes woodland areas, however the proposed restoration scheme seeks to provide enhanced ecological/landscape benefits.</p>	<p>No significant effects considered likely given temporary nature of activity and no change to approved restoration scheme.</p>
<p>14. Are there any inland, coastal, marine or underground waters on or around the location that could be affected by the project?</p>	<p>Likely. Site is located above a Principal Aquifer.</p>	<p>No significant effects anticipated.</p> <p>Existing operations included a Hydrological Risk Assessment and programme of monitoring which have been implemented to date without any known significant environmental effect.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>15. Are there any areas or features of high landscape or scenic value on or around the location that could be affected by the project?</p>	<p>Site is adjacent to the SDNP (south) and Sandgate County Park (northwest).</p> <p>Proposed restoration scheme seeks to provide enhanced ecological/landscape benefits.</p>	<p>No significant effects anticipated.</p> <p>Some potential for landscape impacts associated with revised phasing requirements; however, any such impacts would be temporary in nature.</p>
<p>16. Is the project in a location where it is likely to be highly visible to many people?</p>	<p>Unlikely. Limited number of residential properties with limited views of the site.</p> <p>Site operations predominantly take place in a large depression created by historic quarrying operations.</p>	<p>Significant effects unlikely given temporary nature of development and historic quarrying activities. Visibility is reduced by established mature trees surrounding site.</p>
<p>17. Are there routes on/around the location that are used by the public for access to recreation or other facilities that could be affected by the project?</p>	<p>Unlikely. Vehicular access to the site is taken from Hampers Lane which is also a Public Bridleway (2627).</p> <p>The proposed development would be unlikely to result in any significant changes in impacts experienced by this Bridleway.</p> <p>The proposed restoration of the site includes a number of permissive paths, which would be beneficial.</p>	<p>No significant impacts anticipated.</p>
<p>18. Are there any routes on or around location that are susceptible to congestion or cause environmental problems that could be affected by the project?</p>	<p>Likely.</p> <p>Proposed development results in a HGV movements (maximum 45 in and 45 out weekdays) associated with concurrent extraction and infill would continue over a longer period than originally envisaged (4 rather than 2 years).</p> <p>The development, as amended, would result in HGVs remaining at a higher level for an extended period (45 in and 45 out weekdays for a period of 4 rather than 2 years). However, they would not exceed maximum permitted movements which have occurred over the last two years without known significant Environmental Impact.</p> <p>All HGVs routed directly via the A286 to the A24.</p> <p>Storrington Village AQMA unlikely to be affected as HGVs routed east.</p>	<p>Prolonged period of higher HGV movements anticipated; however, as previously, proposed development constitutes a limited contribution to existing traffic volumes.</p> <p>Unlikely to result in significant environmental effects within the meaning of the Regulations.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>19. Are there any features of historic or cultural importance on or around the location that could be affected by the project?</p>	<p>Unlikely.</p> <p>The western extent of the site lies within a Historic Parkscape, however, this currently includes an sand quarry (neighbouring Cemex Sandgate park Quarry).</p>	<p>No significant impacts anticipated.</p>
<p>20. Will there be any loss of Greenfield land?</p>	<p>Site would be restored for beneficial informal countryside recreation uses.</p>	<p>No impacts anticipated.</p>
<p>21. Are there existing land uses around the location that could be affected by the project?</p>	<p>Unlikely.</p> <p>The east of the site has a common boundary with the neighbouring Sandgate Park Quarry which has been in operation for numerous years.</p> <p>A limited number of residential properties are situated in close proximity to the proposed development site. The nearest being Cadrona on Hampers Lane, situated approximately 12m to the east, and Chanctonbury Lodge, situated approximately 13m to the south (also a Listed Building).</p> <p>Limited change to established operational practices proposed.</p>	<p>No significant impacts anticipated given existing planning controls over environmental mitigation and operational practices.</p>
<p>22. Are there areas on or around the location that are densely populated or built-up, that could be affected by the project?</p>	<p>Unlikely.</p> <p>Storrington village some 2km west.</p> <p>Beyond Hampers Lane to the east, is the Milford Grange residential development that is currently under construction.</p> <p>Within the Heath Common residential area, the nearest dwelling to the site is approximately 170m away, due north.</p> <p>Other residential dwellings situated to the south and south-west of the proposed development site, either side of the A283, are situated between 30 and 90m away.</p>	<p>No significant effects anticipated given existing planning controls over environmental mitigation and operational practices.</p> <p>Some impact from HGVs accessing the site but for a temporary period and likely to constitute a limited contribution to existing traffic volumes.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
<p>23. Are there areas on or around the location that are occupied by sensitive land uses e.g. hospitals, schools, community facilities that could be affected by the project?</p>	<p>Unlikely. Recreation Ground to the north.</p>	<p>No significant effects anticipated. Limited impacts envisaged taking into account established activities and operational controls.</p>
<p>24. Are there any areas in or near the application site that contain high quality or scarce resources that could be affected by the development, e.g. groundwater resources, forestry, agriculture, tourism, minerals?</p>	<p>Likely. The site forms part of an active sand quarry. The proposals seek to ensure mineral reserves would not be sterilised and the site fully restored. Woodland and mature trees within and surrounding the site, however the proposals seek to retain these features and incorporate them into the wider restoration of the site. The site falls on land with links to a principal aquifer, however, it does not fall within a Groundwater Source Protection Zone.</p>	<p>No significant effects considered likely. No change from existing operations which included a Hydrological Risk Assessment and programme of monitoring which have demonstrated that there would be no significant impact on groundwater.</p>
<p>25. Is the location susceptible to earthquakes, subsidence, landslides, erosion, flooding, or adverse climatic conditions that could cause the project to present environmental problems?</p>	<p>Likely. The Health and Safety Executive (HSE) has previously highlighted possible issues with sand faces in the south-western/southern corner of the extraction site. However, the HSE also notes that issues can be overcome through accordance with the Quarry Regulations 1999. Existing planning controls require a 15m buffer zone between the sandpit's southern boundary and the A283 to minimise any risks.</p>	<p>Limited potential for significant effects. The proposed extended period of concurrent extraction/fill, could result in some change to phasing and associated extraction methodology, however, these would continue to be subject to existing controls over operational practices required under the Quarries Regulations 1999 (as controlled by the HSE).</p>
<p>26. Are there plans for future land uses on or around the site that could be affected by the project?</p>	<p>Unlikely. A number of residential developments recently implemented in relatively close proximity to the site, which take access from the A286. Limited changes proposed to existing operational practices proposed are such that any potential impacts would be limited.</p>	<p>No significant effects identified.</p>

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect?
27. Is there a potential for transboundary impacts?	Unlikely.	No significant effects identified.
28. Will any effects be unusual in the area or particularly complex?	Unlikely. No complex effects anticipated.	No significant effects identified, given controls in place through planning and Environmental Permitting regimes, as well as controls through the HSE.

Conclusion

This Screening Opinion relates to a proposal for the continuation of concurrent mineral extraction/import of inert fill for restoration, until the end of 2019. The applicant advises restoration of the site would still be completed within the originally permitted timescales of 1 May 2020. Effectively this would result in the continued concurrent extraction of minerals for a further 2 years, the key likely impacts of such being; a prolonged period of higher HGV movements to/from the site (albeit as volumes to be extracted have not increased the total HGV movements throughout the life of the approved development would remain unchanged), and revised phasing/progressive restoration of the site.

Because the proposed development would constitute a change to a Schedule 2 development and exceed the relevant threshold set out in column 2 to Schedule 2, consideration must be given to the need for EIA. The site is not within a 'sensitive area' as defined in Schedule 2 to the EIA Regulations as a 'sensitive area', however, it is adjacent to the South Downs National Park. It is not subject to any other ecological, landscape, historic or other constraints, and is not within a groundwater source protection zone.

Guidance for determining whether a proposal is EIA development is provided in National Planning Practice Guidance: Environmental Impact Assessment (revised 28 July 2017) to aid local planning authorities to determine whether a project is likely to have significant environmental effects. This includes 'Annex: indicative screening thresholds' which states are *"indicative only and are intended to help determine whether significant effects are likely"*.

In this case the 'key issues to consider' are identified as the *"The likelihood of significant effects will tend to depend on the scale and duration of the works, and the likely consequent impact of noise, dust, discharges to water and visual intrusion."* In approving planning application WSCC/104/13/SR, upon consideration of detailed assessments carried out through the EIA process, it was concluded that the development would not result in significant impact on people or the environment. Given that the present proposal seeks to prolong the development approved under that permission, this conclusion is relevant when considering whether EIA is necessary for the development as amended.

The extent of the approved development already completed is also a relevant consideration. The most recent permission (WSCC/104/13/SR) granted in May 2014 allowed for continued sand extraction for a 2 year period alongside importation of inert fill to restore the site within 5 years. These operations have been taking place over the last 2 years with no known significant environmental

impacts having been caused. The development now considered excludes the material extracted and infilled over that time, so is smaller in scale than was the case with the 2013 application.

The development site is relatively small in the context of the neighbouring quarry (Sandgate Park) and the proposed variation of conditions would not result in any change to the final extent or volume of extraction/fill, and would not extend the overall time in which to complete restoration of the site. Although the proposed development may result in revised phasing of extraction and fill operations to allow them to be carried out simultaneously, operational practices and extant planning controls over noise, dust, and hydrological monitoring would not change.

There is some limited potential that revised phasing would result in slightly different visual impacts, however, taking into account the existing landform and established operations at the site, it is not considered that such impacts would likely be significant. Further, it is noted that there are established operational practices and complementary environmental/operational controls required under the Environmental Permitting regime and Quarry Regulations (regulated by the Environment Agency and HSE respectively).

Overall, taking into account the characteristics and location of the proposed development, the context of the approved land use, controls in place through the planning and Environmental Permitting regulations, and the criteria in Schedule 3 of the EIA Regulations, it is considered that the proposal would not have the potential for significant environmental impact within the meaning of the EIA Regulations.

Screening Opinion.

In the opinion of the Mineral Planning Authority, the development **would not require an Environmental Impact Assessment.**

Signed:

A handwritten signature in black ink, appearing to read 'J. Neave'.

**James Neave
Principal Planner**

Date: 06 September 2017

Reviewed by:

A handwritten signature in black ink, appearing to read 'J. Moseley'.

**Jane Moseley
County Planning Team Manager**

Date: 07 September 2017