

SCREENING OPINION

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

Screening Opinion reference: H20a
Applicant: West Sussex County Council
Agent: Savills Planning Ltd.
Date Received: 28 January 2020
Site: Land east of the A24, West Horsham RH12 1GF

Proposal: Erection of a fire station, training facilities, training yard, access road and associated parking and landscaping.

Classification of the Proposed Development

It is proposed to create a new fire station to serve Horsham, including a three storey fire station building, six storey live fire training building, four storey training tower, a new exit onto the A24 southbound carriageway, and associated works including a vehicle fuelling tank and landscaping. The following is based on the submitting Screening Request, along with further information provided by email on 14 February 2020.

The development is considered to fall within Part 10(b) of Schedule 2 to the EIA Regulations as it relates to an *“urban development project including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas”*, with a development area of 1.7 hectares, exceeding the one hectare threshold set out in Schedule 2.

Accordingly, consideration needs to be given, with reference to Schedule 3 to the EIA Regulations, as to whether the development would have the potential to result in ‘significant environmental effects’ which require an EIA.

Outline planning permission was granted for a housing development on the wider area, including land to the south, east and north, with a fire station use indicated on the site the subject of this Screening Request (Horsham District Council ref. DC/09/2138, granted 17 August 2010 (as amended in part by DC/11/2004)). Condition 1 of the 2010 permission required reserved matters applications to be made within 5 years of the date of its issue. Because no details were provided relating to the part of the site identified for a fire station, as required by condition 4, it is considered these details can no longer be provided under reserved matters and a fresh application must be made.

Characteristics of Development	
Development Area	Site area – 1.7 hectares.
Development Scale	Built development covering the western area of the site, up to 6 storeys in height, with land to east containing smaller buildings and equipment, and yard area, and land to the north containing car parking. The screening request indicates that some 3,000 square metres of new floorspace would be provided.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
1. Will the development involve actions which will cause physical changes in the locality (topography, land use, changes in waterbodies etc)?	Likely. The development would introduce a fire station use to a currently vacant site.	No. The site is immediately east of the A24, south of its elevated junction with the A264. The surrounding area is therefore already urbanised, with a large-scale housing development coming forward to the north, south and east.
2. Will the development use natural resources such as land, water, materials, or energy, especially resources which are non-renewable or in short supply?	Unlikely. Water would be used during live fire training, but the amount is not considered to be significant within the meaning of the EIA Regulations.	No.
3. Will the development involve the use, storage, production of substances or materials which could be harmful to people or the environment?	Likely. The development includes a fuel storage and filling area, as well as LPG storage. Potentially polluting substances would be used during fire-fighting training.	No significant effects anticipated given existing controls through regulation by Environment Agency, Environmental Health, and Health and Safety Executive, and typical drainage/containment/ filtration measures which are known to be effective in protecting people and the environment (e.g. requirement for bunded storage).
4. Will the development give rise to significant noise, vibration, light, dust, odours? <ul style="list-style-type: none"> - during construction - during operation 	Likely. The proposal would require relatively significant construction works, and once operational, large emergency vehicles entering/leaving the site, training activities, and a compressor for breathing apparatus with associated noise and disturbance.	No significant effects anticipated. Construction impacts could be limited by conditions to limit hours, dust/mud emissions and control lighting. During operation, noise impacts are not expected to be significant given background noise levels from adjacent A24; acoustic buffer provided by buildings; and measures such as acoustic housing and mechanical ventilation.
5. Does the proposal have the potential to	Likely. There would be a re-fuelling station on site,	No significant effects anticipated, given

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
release pollutants to air, land, or water?	and live fire situations would be created.	standard controls over fuel containment requiring bunding and containment of contaminants. Scrubbers and thermal oxidisers would be used to clean smoke before gases are released, and water would pass through a filtration system before being released.
6. Are there areas on or around the location which are already subject to pollution or environmental damage – e.g. where existing environmental standards are exceeded, which could be affected by the project?	Likely. The site is greenfield but is adjacent to the A24 which carries high numbers of vehicles.	No significant effects anticipated. Proposal would result in vehicles travelling to/from the site but the impact in terms of pollution and environmental damage is not considered to be significant.
7. Is there a high risk of accidents during construction or operation of the development which could have effects on people/the environment?	Unlikely. Risks of accidents during construction or operation not considered to be high. A high pressure gas main runs along land to the south of the site with associated risks, particularly given use of site for fire training.. Risk of accident through using 'live fire' as part of training. Risk of increased vehicles travelling to/from the site, including large fire appliances.	No significant effects anticipated given implementation of health and safety measures required under separate legislation. Risk through vehicle movements not considered to be significant, and appropriate buffer would be required to ensure pipeline is not put at risk.
8. Will the project result in social changes e.g. demography, traditional lifestyles, employment?	Unlikely. No changes to demography or employment anticipated.	No significant effects anticipated.
9. Are there areas on or around the location which are protected under international, national or local legislation for their ecological, landscape, cultural or other value which could be affected by the project?	Unlikely. High Wood Ancient Woodland and Site of Nature Conservation Interest (SNCI) located some 200m to west, beyond A24, and linking to Sparrow Copse SNCI and ancient woodland to south. The nearest	No significant effects anticipated, given distance to protected features, and separation of SNCI from site by A24.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
	national designations are more than 2km away. There are no conservation areas or listed buildings, or protected landscapes nearby (High Weald AONB is 3.5km east; South Downs National Park some 12.5km south-west).	
10. Are there any other areas around the location which are important for their ecology e.g. wetlands, forests, coastal zone which could be affected by the project?	Unlikely. No such features in the locality.	No significant effects anticipated.
11. Are there any areas on or around the location which are used by protected or sensitive species of fauna or flora which could be affected by the project?	Likely. An extended Phase 1 Habitat Survey has been undertaken and confirmed that there is potential bat habitat, reptile habitat and reptiles within the site.	No significant effects anticipated, given mitigation measures set out in screening request, including protective barriers, minimising lighting etc., all of which would be required through the Wildlife and Countryside Act 1981.
12. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Likely. The River Arun is located around 100m south and south-east of the site, at a lower level.	No significant effects anticipated given distance, and imposition of standard conditions to ensure run-off is contained, and flood risk is not increased off-site.
13. Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?	Unlikely. Site is distant from protected landscapes, and located in an urban area which will be increasingly built up as the surrounding development comes forward.	No significant effects considered likely.
14. Is the project in a location where it is likely to be highly visible to many people?	Likely. Site is immediately adjacent to A24 on the outskirts of Horsham, and abuts a care home, existing housing and housing	Significant adverse visual effects, within the meaning used in the EIA Regulations, not anticipated as the site would be seen in the

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
	which is coming forward.	context of the wider urban environment, including the A24 dual carriageway and associated signage, slipways and bridge.
15. Are there routes on/around the location which are used by the public for access to recreation or other facilities which could be affected by the project?	Likely. The closest public rights of way are some 500m from the site, but when the development to the south is implemented, there would be recreational uses along the river corridor (BMX track, allotments, walkways).	No significant adverse effects anticipated given urban context in which uses would be located, with housing to the immediate south and north, and A24 to west.
16. Are there any routes on or around location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?	Unlikely. No such effects anticipated. Proposal would result in additional vehicles, but has direct access onto A24.	No.
17. Are there any features of historic or cultural importance on or around the location which could be affected by the project?	Unlikely. No such features identified in vicinity.	No significant effects anticipated.
18. Will there be any loss of Greenfield land?	Likely. Site is greenfield land.	Significant effects not anticipated as site is located within urban context, and use is considered to complement this.
19. Are there existing land uses around the location which could be affected by the project?	Likely. There is a care home for elderly people and residential properties immediately east of the site.	While proposal would result in increased activity and disturbance in the vicinity, significant effects not anticipated given measures to minimise off-site impact through site layout (distance between training buildings and dwellings; car parking rather than built development adjacent to care home. Other mitigation measures could be satisfactorily controlled by condition.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
20. Are there areas on or around the location which are densely populated or built-up, which could be affected by the project?	Likely. The site is located on the outskirts of Horsham, with a new built development coming forward to the immediate north/south/east.	No significant effects anticipated as fire station use is considered appropriate within a built-up context.
21. Are there areas on or around the locations which are occupied by sensitive land uses e.g. hospitals, schools, community facilities which could be affected by the project?	See above (Q. 19).	Significant effects, within the meaning of the EIA Regulations, not anticipated given imposition of appropriate conditions to secure mitigation and control emissions from site.
22. Are there any areas in or near the application site which contain high quality or scarce resources which could be affected by the development, e.g. groundwater resources, forestry, agriculture, tourism, minerals?	Unlikely. No such features identified which would likely be affected.	No.
23. Is the location susceptible to earthquakes, subsidence, landslides, erosion, flooding, or adverse climatic conditions which could cause the project to present environmental problems?	Unlikely. No such issues identified. Site not within area at increased risk of flooding.	Significant effects not anticipated.
24. Are there plans for future land uses on or around the site which could be affected by the project?	Likely. Development has begun on land to east/south/ north	No significant effects anticipated with appropriate mitigation measures secured by condition.
25. Is there a potential for transboundary impacts?	Unlikely. No boundaries in vicinity	Significant effects unlikely.
26. Will any effects be unusual in the area or particularly complex?	Unlikely. Proposal is not particularly complex or unusual.	Significant effects unlikely.

Conclusion

The proposal seeks to create a new fire station on greenfield land to the east of the A24. The site is surrounded to the north, south and east by a wider housing development which is coming forward, delivering up to 1,044 dwellings.

The indicative criteria for 'urban development projects' (Part 10(b) of Schedule 2 to the EIA Regulations 2017), as set out in the Annex to the Planning Policy Guidance: EIAs, states that for sites which 'have not previously been intensively developed' the indicative criteria and threshold is if the area of the scheme is more than 5 hectares, which it is not; or it would provide more than 10,000m² of commercial floorspace, which it would not; or it would have 'significant urbanising effects in a previously non-urbanised area', which is not the case with this development alongside the A24.

The 'key issues to consider' are stated in the Annex to be the physical scale, the potential increase in traffic, emissions, and noise. In this instance, the physical scale of the proposal, in the context of the A24 and other existing and forthcoming urbanising features, is not considered to result in significant effects on people or the environment, within the meaning of the EIA Regulations. The impact of traffic is not considered to be significant, particularly given the site's direct access onto the strategic road network. It is considered that emissions from the site could be adequately contained by typical mitigation measures/controls to ensure impacts on the environment and people are not significant, and that this could be secured by condition or controlled by other legislation.

Therefore, having regard to the selection criteria in Schedule 3 of the EIA Regulations, and the matters set out above, it is considered that the proposed development would not have the potential for significant effects on the environment within the meaning of the EIA Regulations 2017.

Screening Opinion

In the opinion of the County Planning Authority the development **does not require an Environmental Impact Assessment.**

Signed: Author



Jane Moseley
County Planning Manager

Date: 17 February 2020

Signed: Reviewer



James Neave
Principal Planner

Date: 04 February 2020

on behalf of the Head of Planning Services