

SCREENING OPINION

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

Screening Opinion reference: RS/19a

Applicant: P J Brown (Construction) Ltd

Agent: WS Planning & Architecture

Date Received: 22 May 2019

Site: Kilmarnock Farm Charlwood Road Ifield
RH11 0JY

Proposal: Proposed Concrete Crushing and Soil Recycling Facility

Classification of the Proposed Development

The proposal is for a soil recycling and concrete crushing facility at Kilmarnock Farm in Horsham. This facility would process up to 75,000 tonnes per year of inert wastes, primarily from construction, demolition and excavation sources, to produce soils and crushed concrete. This screening opinion has been conducted in relation to a recently submitted planning application ref. WSCC/041/19.

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 development falls within Part 11(b) of Schedule 2 to the EIA Regulations as it relates to an 'installation for the disposal of waste', and relates to a development area of more than 0.5 hectare.

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.

| Characteristics of Development | |
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| Development Area | Site area – 0.67 hectares |
| Development Scale | The development would result in the creation of a new internal concrete access road, turning bays and new bell mouth access onto Charlwood Road. The site would be entirely enclosed within a 4.5m acoustic fence. The site would contain large stockpiles and stock bays of materials, a site office, and wheel wash facilities. The proposed development would also require removal of a number of existing mobile buildings and associated structures. |

| | Likely/Unlikely – briefly describe | Is this likely to result in a significant effect? Yes/No – why? |
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| 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 waste recycling facility with large stockpiles, new drainage and attenuation ponds, fencing, hard surfacing and significantly enlarged vehicular access. | No. Although there would be physical changes, the effect would be localised. |
| 2. Will the development use natural resources such as land, water, materials, or energy, especially resources which are non-renewable or in short supply? | Likely. The site would be used for material recycling once the works are completed. Fossil fuels to operate machinery would be used. | No. The amount of resources used is not expected to be significant within the meaning in the EIA Regulations. |
| 3. Will the development involve the use, storage, production of substances or materials which could be harmful to people or the environment? | Likely. The proposed facility would process up to 75,000t of inert waste. Waste would be inert, however, there is some potential for contaminated loads. | No. The site would be subject to controls through the Environmental Permitting process. With these controls, and appropriate conditions being imposed through the planning process regarding the type of waste managed at the site, it is considered that impacts from potentially harmful substances could be minimised to an acceptable level. |
| 4. Will the development give rise to significant noise, vibration, light, dust, odours? <ul style="list-style-type: none"> - during construction - during operation | Likely during construction and operation when there would be movements of machinery and waste around the site, including a screener, and crusher. The development would involve the processing and storage of waste and crushed/graded material in the open. The local noise environment is to some extent affected by the aircraft noise. | No. There would inevitably be potential for adverse effects resulting from the proposed activities; however, significant effect, within the meaning of the Regulations, is not anticipated with imposition of appropriate conditions to control vehicular movements, hours of operation, lighting, require noise/dust mitigation measures, and restrict processing on site. A Noise Survey has been submitted concluding noise impacts would not be significant subject to |

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| | | careful location of plant and a noise barrier. |
| 5. Does the proposal have the potential to release pollutants to air, land, or water? | Likely during operation as waste would be managed at the site. | No. Subject to typical planning conditions to ensure dust is controlled, waste is inert, and appropriate drainage in place, and additional controls as required by the Environmental Permitting regime, any impacts would likely be localised, and not significant within the meaning of the EIA Regulations. |
| 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? | Unlikely. There a number of storage and general industrial facilities (e.g. motor mechanics) located on the wider Kilmarnock Farm site, but not known to have caused environmental damage. Gatwick Airport in close proximity which gives rise to aircraft noise. | No significant effects anticipated. |
| 7. Is there a high risk of accidents during construction or operation of the development which could have effects on people/the environment? | Unlikely. Project would involve movement of heavy vehicles and crushing/screening plant, but risk of accident not considered to be high. Potential for increased risk of 'Bird strike' for aircraft if birds are attracted to proposed landscaping and waterbodies, albeit these are limited in size and extent. | No. Usual health and safety measures (PPE, reversing alarms, staff training etc.) would ensure risk low is minimised. Landscaping to minimise attraction of birds possible by planning condition. |
| 8. Will the project result in social changes e.g. demography, traditional lifestyles, employment? | Unlikely. No significant 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 | Likely. Ancient woodland site approximately 200m to the south/west of the site, albeit separated by Charlwood Road. | No. The impacts of the development are likely to be sufficiently contained within the site to ensure there would be no |

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| ecological, landscape, cultural or other value which could be affected by the project? | Wood near Lower Prestwood Farm (SNCI) approximately 920m to the west. Willoughby Fields (SNCI) approximately 650m to the east. | significant effects on designated features in the vicinity which are relatively distant. |
| 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. There are no other ecologically important sites within proximity to be affected by the project. | 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? | Unlikely. The existing site includes a number of areas of hardstanding and land in equine use. | No. Nearby hedgerows/trees could potentially support protected species, however potential for significant impacts, within the meaning of the Regulations is considered unlikely. |
| 12. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project? | Unlikely. No such features identified. Site is not within a groundwater source protection zone or area at increased risk of flooding. | No significant effects anticipated within the meaning of the Regulations. |
| 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. No designated landscape features within or in close proximity to site. A Public Footpath (1511) runs to the east of the site which occupies a rural location. | Potential for impacts upon landscape and rural setting, however, no significant effects anticipated within the meaning of the Regulations. |
| 14. Is the project in a location where it is likely to be highly visible to many people? | Likely. The site is located directly north of Charlwood Road and would require a widened access thereto. Approximately 80m to the east a Public Footpath (1511) runs parallel to the east of the site. | Potential for more open views of the site; however, no significant effects anticipated within the meaning of the Regulations given the context of existing built development and screening proposed, and transitory nature of views. |
| 15. Are there routes on/around the location which are used by the | Likely. Approximately 80m to the east a Public Footpath | No significant effect expected given separation distance. No direct effect |

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| public for access to recreation or other facilities which could be affected by the project? | (1511) runs parallel to the east of the site. | on PROW, and views would be largely transient. |
| 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? | Likely. Vehicles would travel to/from the site via Charlwood Road. The proposed development would result in 60 two-way HGV movements a day (60 in and 60 out). | No significant effects on congestion or the environment expected, within the meaning of the Regulations, based on proposed increase in vehicle movements. |
| 17. Are there any features of historic or cultural importance on or around the location which could be affected by the project? | Unlikely. A Scheduled Monument (Medieval Moated Site at Ifield Court) approximately 350m to the south. Ifield Conservation Area approximately 630m to the south. No known buried archaeological features within the application site. | No. With the exception of additional vehicular movements on the highway network, the impacts of the development are likely to be sufficiently contained such as to ensure there would be no significant effects on historic features which are somewhat distant from the site. Low probability of impact on buried archaeology. |
| 18. Will there be any loss of Greenfield land? | Likely. The southern part of site is considered to be greenfield. | No significant impact anticipated. The extent of greenfield land affected is relatively small. |
| 19. Are there existing land uses around the location which could be affected by the project? | Likely. A residential dwelling (part of the wider Kilmarnock Farm site) lies immediately to the east of the application site. Stables and a sand school forming part of a horse rescue centre within the wider Kilmarnock Farm site also lies immediately to the east. A number of small general industrial, storage, distribution businesses are also present on the wider farm site. | No significant effect anticipated within the meaning of the EIA Regulations with imposition of appropriate conditions to control vehicular movements, hours of operation, lighting, landscaping specifications, noise/dust mitigation measures, and restriction of processing on site. A Noise Survey has been submitted concluding noise impacts would not be significant subject to careful location of plant and a noise barrier. |

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| | <p>A number of mobile homes present on site and adjacent land, albeit understood that these would either be removed or do not benefit from planning permission.</p> <p>Public Footpath (1511) approximately 80m to the east.</p> <p>Approximately 200m to the east is a community outreach centre which provides support for people with learning disabilities and autism.</p> <p>Little Foxes Hotel approximately 150m to the south-west of the site.</p> <p>More widely residential properties located along the highway network which HGVs would be routed to/from the site.</p> <p>Gatwick Airport is approximately 850m to the north east.</p> | |
| 20. Are there areas on or around the location which are densely populated or built-up, which could be affected by the project? | Likely. Site is situated some 650m from defined 'built up area boundary' of Crawley (as defined by the Crawley Borough Local Plan 2015 - 2030) and densely populated town. | No significant impact anticipated given distance from site. Potential impacts likely to be restricted to HGV movements. |
| 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 19 above. | See 19 above. |
| 22. Are there any | Unlikely. No such | No significant impacts |

| | Likely/Unlikely – briefly describe | Is this likely to result in a significant effect? Yes/No – why? |
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| 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? | features identified within or in the immediate vicinity of the site. | anticipated. |
| 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 areas identified. | No significant impacts anticipated. |
| 24. Are there plans for future land uses on or around the site which could be affected by the project? | Likely. The site falls within an area safeguarded for a potential future runway within the 2018 Gatwick Draft Master Plan. | No. Although the compatibility of the development with an area safeguarded to address long term airport capacity is an important consideration in terms of the principle of the development, potential for significant environmental impacts not considered likely, given consideration that could be given to temporary use, and limited built structures proposed. |
| 25. Is there a potential for transboundary impacts? | Unlikely, though some vehicles would travel to/from the site through Crawley Borough which is located some 80m south of the site. | While the site is close to the boundary with Crawley Borough, no significant impacts, within the meaning of the Regulations, are anticipated. |
| 26. Will any effects be unusual in the area or particularly complex? | Unlikely. Typical waste management facility proposed. | No significant effects anticipated. |

Conclusion

The proposal is for a soil recycling and concrete crushing facility at Kilmarnock Farm in Horsham District which would process inert wastes, primarily from

construction, demolition and excavation sources, to produce soils and crushed concrete.

The indicative criteria for 'installations for the disposal of waste' (Part 11(b) of Schedule 2 to the EIA Regulations 2017), as set out in the Annex to the Planning Policy Guidance: EIAs, states that EIA is more likely where new capacity would be created to hold more than 50,000 tonnes/year, or to hold waste on a site of 10 hectares or more. It further notes that sites taking smaller quantities of these wastes, or seeking only to accept inert wastes are unlikely to require EIA. The Annex also notes that the key issues to consider are the scale of the development and the nature of the potential impact in terms of discharges, emissions or odour.

In this instance the proposed development would have a capacity of 75,000 tonnes per year, but would only process inert waste, and on a site under 1 hectare in size. While the development has the potential for impact on the environment and people, subject to conditions and Environmental Permitting controls it is not considered there is a risk of *significant* effects, within the meaning of the EIA Regulations.

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:



James Neave
Principal Planner

Date: 14 August 2019

Signed:



Jane Moseley
County Planning Manager

Date: 14 August 2019

on behalf of the Head of Planning Services