

SCREENING OPINION

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

Screening Opinion reference: HF/19a
Applicant: Southern Water

Date Received: 20 September 2019

Site: Henfield Wastewater Treatment Works,
Crouch Hill, Henfield, West Sussex BN5
9JN

Proposal: Installation of additional wastewater infrastructure to accommodate EA Regulations.

Classification of the Proposed Development

Southern Water is seeking to upgrade the existing wastewater work plant to provide environmental improvement and ensure the discharge from the site to Cutlers Brook meets Environment Agency requirements.

The works proposed are as follows:

- The installation of a non-walk-in Ferric Dosing Kiosk measuring 3.95m in width, 5.43m in length and 2.85m in height;
- The installation of a non-walk-in Alkalinity Dosing Kiosk measuring 3.30m in width, 4.15m in length and 2.60m in height;
- The installation of 2 Mecana Filters measuring 2.68m in width, 5.7m in length and 3.55m in height;
- The installation of Flocculation Tank measuring 2.56m in width, 5.50m in length and 3.30m in height;
- The installation of a Final Effluent Sample Chamber measuring 0.7m in width, 1.2m in length and 1.8m in height;
- The installation of a Final Effluent Monitoring Kiosk measuring 1.65m in width, 1.65m in length and 2.5m in height;
- The installation of an Emergency Safety Shower measuring 1.5m in width, 1.5m in length and 3.0m in height;
- The erection of a Bunded Delivery Area measuring 11m in Width and 4m in Length, with a bund the height of a kerb.
- The installation of associated drainage pipework and cable ducts, control panels, interception chamber, distribution boards and new dosing points.

The works proposed are to be completed in an estimated 40 week period, with new temporary construction compound installed, consisting of eight cabins on hard standing measuring approximately 1200m², located on grassland in the southern part of the site; and the use of the existing internal site access road within the site boundary.

The site is not subject to any landscape, ecological, historic or other designations. However, it is in close proximity to four Ancient Woodland areas, at closest sitting 700m to the west, and Chestham Park Historic Parkscape lies some 240m to the north. There is a public right of way (footpath 2542) some 180m south-east.

The northern edge of the site resides within Flood Zone 2 (higher risk of flooding), where multiple tanks and kiosks are proposed, beyond which is a small surface water body (Cutlers). The site is not located within a groundwater source protection zone, but is located in a Secondary A Superficial Aquifer. On the northern border there are 2 Trees (ash and white poplar) which are proposed for removal; these are not protected by a Tree Preservation Order. The closest residential neighbours sit approximately 80m to the south, with 220m between the two Mecana Filters and the residential neighbours.

In considering the proposal it is noted that if the works are not EIA they would be 'permitted development' under Schedule 2, Part 13, Class B of the Town and Country Planning (General Permitted Development)(England) Order 2015. This class of 'permitted development' has no conditions attached so there is no certainty, through the planning process, that the mitigation measures set out in the Screening Request would come forward. However, as a statutory water undertaker under Chapter I of Part II of the Water Industry Act 1991, Southern Water is subject to a duty to comply with various requirements under S3 of the Act including to (in summary) preserve and conserve flora and fauna, urban/rural amenity, features of historic interest, and freedom of access.

They would also be subject to more general legislative provisions such as the Wildlife and Countryside Act 1981 (as amended) and the Hedgerows Regulations 1997, identified as relevant below, which would give more certainty that the environment would be protected in bringing forward the 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').

However, the development falls within Part 11(c) of Schedule 2 to the EIA Regulations as it relates to waste-water treatment plants, and the development site exceeds the 1,000m² threshold set out in Schedule 2 if the access road is taken into account.

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	
Development Area	The WTW Site is 0.24 hectares.
Development Scale	The development is across the entirety of the site. It mainly includes multiple installations of dosing plants and associated infrastructure, with minor alterations to the access of the site within the boundary.

	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)?	Unlikely. No changes to topography, land use or waterbodies proposed.	No significant effects anticipated.
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. The site is currently used for wastewater treatment and unlikely to affect the area outside the site.	No significant effects anticipated.
3. Will the development involve the use, storage, production of substances or materials which could be harmful to people or the environment?	Likely. The use of chemicals to clean sewage.	No significant effects anticipated, given existing controls in place through the Environmental Permitting and Health and Safety regimes.
4. Will the development give rise to significant noise, vibration, light, dust, odours? - during construction - during operation	Likely. During construction light, noise, and dust will inevitably increase, both on site and as a result of vehicle movements to/from the site. During operation noise is likely to increase due to the installation of new machinery (mecana filters).	No significant effects anticipated, particularly given controls of 'nuisance' under the Environmental Health regulations. Construction works centred in northern part of site, more than 160m from residential facades.
5. Does the proposal have the potential to release pollutants to air, land, or water?	Likely. Temporary effects whilst construction takes place for a period of 40 weeks, and potential increase due to increased site throughput.	No significant effect anticipated. Construction emissions would be temporary and controlled by Health and Safety legislation. Ongoing, operational impacts not considered to be significant, given controls

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
		in place through Environmental Permitting regulations, and that works are proposed to improve environmental performance.
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 a Wastewater treatment works.	No significant effect anticipated. Works would not exacerbate any existing damage, particularly as they are being undertaken to improve environmental performance.
7. Is there a high risk of accidents during construction or operation of the development which could have effects on people/the environment?	Unlikely. Proposed development would include an increase in vehicular movements on site, but none of which are considered to be high risk.	No significant effect anticipated. Health and safety procedures and measures would be in place ensuring a low risk.
8. Will the project result in social changes e.g. demography, traditional lifestyles, employment?	Unlikely. No changes would occur to the demography, traditional lifestyle or employment occurring due to this development.	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. No areas protected by international, national or local legislation are likely to be affected by the project.	No significant effects anticipated.
10. Are there any other areas around the location which are important for their ecology e.g. wetlands,	Unlikely. Four areas of Ancient Woodland within 2km of the proposed developments, the closest of which is	No significant effects anticipated.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
forests, coastal zone which could be affected by the project?	approximately 700m to the west with A281 between them.	
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. Amenity grass land to the south of the site would be used during construction for temporarily hard standing and temporary buildings.	No significant effects anticipated. The grassland is within the operational WWTW, and the effect on would be temporary.
12. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?	Likely. The site is within a Secondary A Superficial Aquifer.	No significant effects anticipated, particularly given controls through the Environmental Permitting 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. The proposed works are taking place within an existing compound, and none of the works would exceed the height of other facilities within the site.	No significant effects anticipated.
14. Is the project in a location where it is likely to be highly visible to many people?	Unlikely. Although the nearest residential properties are 80m south-west, and a public right of way 180m south-east, they are both substantially screened by trees/vegetation.	No significant effects anticipated.
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?	Unlikely. Public right of way 180m south-east of site, but screened by vegetation.	No significant effects anticipated.
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 due to relative small scale of works, and close proximity to essential road networks, Close proximity to the M23 via B2116 and A281.	No significant effects anticipated. .
17. Are there any features of historic or cultural importance on or around the location which	No. While the site is some 240m south of Chestham Park, proposed development is relatively	No significant effects anticipated.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
could be affected by the project?	small in scale, and would not increase the height of structures on the site.	
18. Will there be any loss of Greenfield land?	Unlikely. No Loss of Greenfield land. Temporary buildings/ hardstanding are being erected on amenity grassland but within the existing WWTW, and removed after construction.	No significant effects anticipated.
19. Are there existing land uses around the location which could be affected by the project?	Unlikely. No such uses identified.	No significant effects anticipated.
20. Are there areas on or around the location which are densely populated or built-up, which could be affected by the project?	Likely. There is a town (Henfield) to the South, closest residents located 80m south.	No significant effects anticipated. Works would take entirely within the existing WWTW.
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?	Unlikely. No such uses identified in the vicinity of the site.	No significant effects anticipated.
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, albeit there is a Secondary A Superficial Aquifer underlying the site and it is adjacent to a small surface waterbody (Cutlers).	No significant effects anticipated. Impacts on ground/surface water would be controlled through the Environmental Permitting process.
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. While the northern border of the WWTW falls within Flood Zone 2, no works would be undertaken within it. No significant increase in impermeable surface proposed.	No significant effects anticipated.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
24. Are there plans for future land uses on or around the site which could be affected by the project?	Unlikely. No future land uses likely to be affected by the project.	No significant effects anticipated.
25. Is there a potential for transboundary impacts?	Unlikely. The proposed works would be kept within the WTW and it does not come close to other boundaries.	No significant effects anticipated.
26. Will any effects be unusual in the area or particularly complex?	Unlikely. Proposed works would not be unusual or complex as they are for improvements on an existing site to reduce environmental impact.	No significant effects anticipated.

Conclusion

The proposal consists of new machinery, and upgraded infrastructure to accommodate, at the existing site at Henfield Wastewater Treatment Works. The proposed installation of several pumps, filters, tanks and relevant safety features would require the installation of temporary offices and a hard standing gravel car park in the south of the site during the construction period. The work is estimated to be completed in 40 weeks with works being avoided on Sundays and Bank Holidays.

The indicative criteria for waste water treatment plants (Part 11(c) 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 the site area exceeds 10 hectares, or the capacity exceeds 100,000 population equivalent. The annex also notes that the key issues to consider are the size, treatment process, pollution and nuisance potential, topography, proximity of dwellings, and the potential impact of traffic movements.

In this instance, the proposed works would be entirely located within an existing site; the height of development would be lower than the existing so contained within the site; and the works would minimise the impact of the WWTW on the environment. Upon completion, the proposed works would improve efficiency and continue to help increase the amount of homes the WTW currently serves.

There would be some impact resulting from the construction, including disturbance and the removal of trees, but the impact would not be 'within the meaning of the EIA Regulations, particularly as it is would be on an existing site with no protected ecology or arboriculture. Further, any construction related impacts would be temporary in nature.

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:
Tyra Money

Reviewer:
Jane Moseley



Date:
4 October 2019

Date:
7 October 2019

on behalf of the Head of Planning Services