

SCREENING OPINION

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

Screening Opinion reference: WG/20a

Applicant: A. Hyatt Contractors LTD

Agent: Douglas J. P. Edwards

Date Received: 28/01/20

Site: Land at Thistleworth Farm, Grinders Lane, Dial Post, Horsham, West Sussex, RH13 8NR

Proposal: Change of use from agricultural land to a construction/demolition/excavation waste recycling facility.

Classification of the Proposed Development

The proposal seeks to regularise the retrospective change of use from agricultural land to a proposed inert waste recycling facility at Thistleworth Farm in Horsham. This facility would import and screen up to 25,000 tonnes per year of inert wastes, primarily from construction, demolition and excavation sources, to produce soils and other recycled materials for onward transport/use. This screening opinion has been prepared in relation to a recently submitted planning application relating to this development (ref. WSCC/009/20).

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 hectares.

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	Site area – 0.9 hectares
Development Scale	The development consists of a bunded site (bunds to approximately 3m in height), within which materials are screened and stockpiled. It requires the use of plant / machinery including: tipper lorry, screening machine; excavator diggers and stockpiles. A single storey modular site office, parking and ancillary containers/equipment is situated to the south-east. The site also includes access gates and hard standing.

	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 operations on site include the creation of bunds, hardstanding, stockpiles and heavy machinery to sort inert wastes. The land use is proposed to change from agricultural land.	No significant impacts anticipated. The site is situated immediately adjacent to the A24 and the site context includes a large bund directly to the east created when the A24 was constructed. Although there would be physical changes, the effect would be relatively 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. Fossil fuels are expected to be used when running the machinery for sorting the recycling material.	No significant impacts anticipated. Although fossil fuels are being used this would be in limited volumes.
3. Will the development involve the use, storage, production of substances or materials which could be harmful to people or the environment?	Possibly. The proposal is for the processing of some 25,000t per annum of inert waste, however, imports could contain contaminated material.	No significant impacts anticipated due to the limited volume and inert nature of materials to be processed. The site would be subject to the Environmental Permitting regime (EA) which would detail requirements for managing unexpected contaminated material, to ensure impacts from potentially harmful substances could be

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		minimised to an acceptable level.
<p>4. 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 during operation as there would be movements of machinery and waste around the site, and the use of plant such as a screener.</p> <p>The development would involve the processing and storage of waste and material in the open.</p> <p>The background local noise environment is to some extent affected by traffic noise from the A24.</p>	<p>No. There would inevitably be potential for adverse effects resulting from the proposed activities, albeit relatively localised.</p> <p>Significant effects, within the meaning of the Regulations, is not considered likely with imposition of typical controls over vehicular movements, hours of operation, lighting, requiring noise/dust mitigation measures, and restrict processing on site.</p> <p>A Noise Survey has been submitted concluding noise impacts would not be significant.</p>
<p>5. Does the proposal have the potential to release pollutants to air, land, or water?</p>	<p>Likely, as a site which will be processing waste.</p>	<p>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.</p>
<p>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?</p>	<p>Unlikely. South of the proposed site there is an established inert waste recycling site (WSCC/008/15/WG), which is not known to have exceeded environmental standards.</p> <p>The site is immediately adjacent to the A24.</p>	<p>No significant effects anticipated, including cumulatively.</p>
<p>7. Is there a high risk of accidents during</p>	<p>Unlikely. The operation would entail the use of</p>	<p>No significant impacts anticipated. Typical PPE,</p>

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construction or operation of the development which could have effects on people/the environment?	heavy machinery on site, but risk of accident not likely to be high.	staff training and other safety measures will be in place for protection of individuals, minimising the risk posed.
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 impacts anticipated due to the limited scale of the development.
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. Ancient Woodland Approx. 350m to the south of the proposed site. Listed Building (Thistleworth Farmhouse) Approx. 100m to east of the site, albeit separated by a large existing bund.	No significant impacts anticipated. The impacts of the development are likely to be sufficiently contained within the site to ensure there would be no significant effects on designated features in the vicinity which are relatively distant. The context of the A24 and presence of a large bund, which separates the site from the neighbouring Listed building, is likely to ensure there would be no significant effects on cultural value, within the meaning of the regulations.
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 impacts 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. No protected or sensitive flora or fauna known to be present near the site.	No significant impacts anticipated.
12. Are there any inland, coastal, marine or underground waters on or around the location which	Unlikely. Potential for impact on nearby watercourses arising from open	No. Subject to typical planning conditions to ensure waste is inert and appropriate drainage in

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
could be affected by the project?	treatment of waste and potential contamination of surface water. However, only typical surface water drainage ditches in the locality. Site is not within a groundwater source protection zone or identified Flood Zone.	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.
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. A Public Footpath shares the access to 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?	Unlikely. The site is located between the A24 (which has mature trees/vegetation along its boundary) and a large bund. However, the access to the site is also a public footpath which also crosses land within view to the north.	No significant impacts 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?	Likely. A public footpath shares the access to the site, and runs along the southern boundary. Public footpaths also run parallel to the east of the site some 100m distant, albeit separated by a large bund.	No significant effect expected within the meaning of the EIA Regulations. Extent of PROW likely to be directly affected by shared access, already an established farm access.
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. The site's access joins the junction of Grinders Lane and the A24 where traffic volumes and speeds are high. The proposed development suggests 12 HGV movements a day (6	No significant effects on congestion or the environment expected, within the meaning of the Regulations, based on proposed increase in vehicle movements.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
	in/6 out).	
17. Are there any features of historic or cultural importance on or around the location which could be affected by the project?	<p>Likely.</p> <p>Listed buildings in the locality including;</p> <p>Thistleworth Farmhouse approx. 100m to the east;</p> <p>Woodman's Stud approx. 200m to the west; and</p> <p>Platts Green Cottage approx. 450m to the south.</p> <p>Some potential for buried archaeological features as previously identified in the locality as part of A24 works.</p>	<p>No.</p> <p>Noting the separation between the site and heritage buildings afforded by a large bund, existing roads, and built development, no significant impacts within the meaning of the EIA Regulations expected.</p> <p>Potential impacts of further excavation on any buried archaeological features could likely be addressed by a typical planning condition.</p>
18. Will there be any loss of Greenfield land?	Likely. The whole site is considered greenfield land.	No. The area of land affected is relatively small (under 1 hectare) and any impacts not considered significant within the meaning of the EIA Regulations.
19. Are there existing land uses around the location which could be affected by the project?	<p>Likely.</p> <p>Residential properties to the east (beyond established A24 bund), and also to the west (100m away but separated by the A24).</p> <p>Garden Centre complex and commercial premises to the south (opposite site access form Grinders Lane), beyond which is a caravan park.</p> <p>PROW in the locality (see above).</p>	<p>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, noise/dust mitigation measures, and restriction of processing on site.</p> <p>A Noise Survey has been submitted concluding noise impacts would not be significant.</p>
20. Are there areas on or around the location which are densely populated or built-up, which could be affected by the project?	<p>Unlikely.</p> <p>Site occupies rural location distant from built-up areas.</p>	No significant impacts anticipated.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
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 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. Unlikely. No such features identified within or in the immediate vicinity of the site.	No significant impacts 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. Some potential for surface water flooding, albeit not within an identified zone at increased risk of flooding.	No significant impacts anticipated.
24. Are there plans for future land uses on or around the site which could be affected by the project?	No identified development plan allocations or development proposals for new uses in the locality. Applicant has raised levels to the north of the site with imported inert waste, purported to be an agricultural improvement. However, this would unlikely affect the development subject of this opinion.	No significant impacts anticipated.
25. Is there a potential for transboundary impacts?	Unlikely. Albeit some potential for source of waste imports from neighbouring districts.	No significant impacts anticipated.
26. Will any effects be unusual in the area or	Unlikely. Typical waste management facility	No significant impacts anticipated.

	Likely/Unlikely – briefly describe	Is this likely to result in a significant effect? Yes/No – why?
particularly complex?	proposed.	

Conclusion

This screening opinion relates to a retrospective proposal for the change of use from agricultural land to a waste recycling facility at Thistleworth Farm in Horsham District, processing inert wastes, primarily from construction, demolition and excavation sources, to produce soils/aggregates and other sorted recycled materials for onward transport/use.

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 25,000 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 typical conditional controls and accordance with the required Environmental Permitting regime, 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: 11 May 2020

Signed:



Jane Moseley
County Planning Manager

Date: 11 May 2020

on behalf of the Head of Planning Services