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Your Ref: N/A

Our Ref: P/76/16/PL

Please ask for:
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Environmental Screening Opinion for Land at Seftler Road, Pagham

The Council considers the above proposal to be a Food Industry project under 7(B) "Packing and canning of animal and vegetable products" within Schedule 2, Regulation 2(1) of The Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

With regard to the stated Schedule 2 criteria and thresholds, it is noted that the proposed floor space area of over 7500 square metres exceeds the limit of 100 square metres. The proposal is therefore Schedule 2 development and requires screening under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended by S.I. 2015:660).

It is therefore necessary to consider the proposal against Schedule 3 of the Regulations. This schedule outlines the criteria to consider in determining whether development falling within Schedule 2 will require an EIA. The criteria includes the characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated); the environmental sensitivity of the location; and the characteristics of the potential impact (e.g. its magnitude and duration).

In addition, the Schedule 2 indicative thresholds set out in the same section of the PPG state in respect of 7(b) that:

"Operational development covers a site of more than 10 hectares. Smaller developments expected to give rise to significant discharges of waste, emission of pollutants or operational noise.

- (i) The area of new floor space exceeds 1,000 square metres*
- (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or*
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)."*

Furthermore, the following are identified as the key issues to consider –

- (i) development involves a process designated as a 'scheduled process' for the purpose of air pollution control;*
- (ii) the process involves discharges to water which require the consent of the Environment Agency;*
- (iii) the installation would give rise to the presence of environmentally significant quantities of potentially hazardous or polluting substances;*
- (iv) the process would give rise to radioactive or other hazardous waste; or*
- (v) the development would fall under Council Directive 96/182/EC on the control of major accident hazards involving dangerous substances (COMAH)*. * The need for a consent under other legislation is not itself a justification for Environmental Impact Assessment.*

Our Screening Response now continues with regard to the Schedule 3 Headings.

(1) Location of the Development

The site is in industrial scale agricultural use and is near to the urban edge of Pagham/Rose Green on its eastern & southern sides. The site is surrounded by hedgerows, especially on the eastern boundary with Pagham Road. The site is not affected by any footpaths but will have long distance views from footpaths to the north and south. The land currently comprises agricultural land of Grade 3.

There are existing drainage ditches to the west and south of the site; however, the site lies mainly within Flood Zone 1 but a section of the site parking area and a small section of the reed bed is in Zone 3. At the closest point, the site is approximately 1.78km from the boundary of the Pagham Harbour SSSI, Special Protection Area (SPA) & Ramsar site. Furthermore, there are no wildlife designations affecting the site itself. The site does also contain hedgerows and ditches which may provide opportunities for protected species. However, it is also noted that there is a limited range of protected/notable species recorded on or close to the site. It is not considered that this is an environmentally sensitive site.

The site does adjoin with Listed Buildings 80m to the north Sefter Farmhouse & Sefter Granary (which form part of the wider site ownership) and is near to Rookery Farmhouse 431m to the south. However, the site is already characterised by larger industrial buildings to which the Sefter Farmhouse and Granary already relate. The significant separation distance from Rookery Farmhouse, the impact it already receives from the industrial buildings and the separation which includes a built up balancing pond mean the impact on this listed building would also be limited.

(2) Characteristics of the Development

The development consists of a building for the packaging, preparation & distribution of fresh foods with ancillary accommodation associated with the existing horticultural business, revisions to internal access road, car parking & hardstanding areas & landscaping & provision of a wetland. The development will use the existing site access from Pagham Road. There is no indication as to the extent of any change in levels.

It is noted that the agricultural industrial use of the site will be in character with the existing use of the wider site and neighbouring land to the east. Furthermore, it is not considered that the development will create any significant waste, pollution or noise over and above what might be typically expected of the construction or 'functioning' of a typical vegetable packing plant.

The development will generate additional traffic and people movements within the local area. However, it is not considered that this will be significant in the context of the EIA regulations with good access to the A27 to the north.

(3) Characteristics of the Potential Impacts

It is not considered that the characteristics of the likely impacts are such that they are particularly significant, long lasting, that they affect a significant area of the district or that they are complex.

It is not considered likely that the development will result in significant harm to ecological interests and it is considered that appropriate mitigation can be employed to respond to any localised harm to the site integrity that may occur.

The site is not at risk of flooding and the development represents a potential opportunity to improve the existing surface water drainage system and reduce the discharge rates to local watercourses, especially through the creation of a reed bed to the north of the site.

Although the increase in vehicular (namely HGV movements) and other modes of traffic will be noticeable within the local area, it is not considered that this impact will be significant (in the context of the EIA Regulations) or long lasting. It is likely that over time, the new development will become accepted by the local population and the impacts will therefore soften and fade. The new employees are also encouraged to use sustainable modes of transport to get to work in the morning and this is included in the Transport assessment submitted with the application. No additional car parking spaces are proposed.

It is not considered that landscape impacts will be significant in the context of the EIA regulations. The surrounding landscape is flat and either urban (residential) or rural countryside. Potential landscaping and/or woodland planting and the reed bed to the boundaries of the site which adjoin with open countryside are likely to be sufficient to ensure that there is no significant or long lasting impact on the wider landscape.

Finally, although the construction phase of the building would result in some impacts (such as noise and dust) on the local population, these effects are likely to be short lived and not significant.

Cumulative Effects

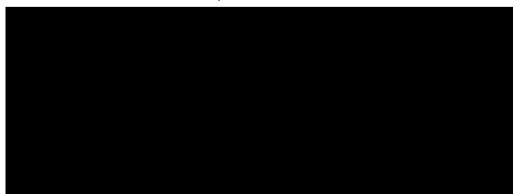
It is noted that the PPG states at paragraph 024 (Reference ID: 4-024-20140306) states with regard to cumulative effects that *"There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development"*. It is not considered that there are any other existing or approved developments nearby which should be taken into account when assessing cumulative effects.

It is noted that this development could be carried out alongside application P/68/15/PL which was granted approval in 2015. This was for a Glasshouse, balancing pond/irrigation storage, staff facilities, water tanks, security fence & access road. However, it is not considered that the cumulative impacts of both developments would lead to significant environmental impacts. This is reasonable as the building will be situated next to an existing group of industrial buildings and had the applications been submitted as one larger scheme it is unlikely an EIA would have been required.

Conclusion

Having taken into consideration the above factors and having particular regard to the nature and scale of the proposal, it is not considered that the development has the potential to result in significant impacts on the environment. The impacts would be of limited scale and could be mitigated in accordance with standard methods. As such, it is considered that the proposed development does not constitute EIA development and as such an Environmental Statement is not required in this instance.

Yours sincerely,



Richard Temple
Senior Planning Officer