

SCREENING OPINION

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

Screening Opinion reference: BE/23a

Applicant: Recycle Southern Ltd

Contact: Christian Smith (Agent)

Date Received: 5 June 2023

Site: Recycle Southern Ltd, Elbridge Farm Chichester Road, Bognor Regis, PO21 5EF

Proposal: Regularisation, consolidation and extension to the existing waste transfer facility including an increase in throughput of waste

Classification of the Proposed Development

The proposal is subject of a live planning application WSCC/021/23.

The proposed development seeks to regularise and consolidate changes to the layout/physical development at an established waste transfer and recycling facility, that have taken place since approval of the original planning permission. In addition, the proposal includes a physical expansion of the facility (of approximately 0.8ha) to include additional buildings/land centrally within the operational area, and an extension into neighbouring agricultural land to the north and east of the site. The applicant proposes an increase in the maximum permitted throughput of the facility of up to 75,000 tonnes/annum (an increase of 45,000tpa over that currently permitted and to expand the existing waste transfer and recycling operation.

The types of waste permitted to be managed at the site would not change, nor would the hours of operation.

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 originally approved development (ref. WSCC/036/14/BE) was considered to fall within Schedule 2 of the Environmental Impact Assessment Regulations, Part 11(b) 'Installations for the disposal of waste'. Considering the scale and nature of the proposals and the potential for significant environments effects, it was concluded that an EIA was not necessary.

The current proposal is considered to fall within Schedule 2, Part 13(b) as relating to a 'change to or extension of development of a description listed in paragraphs 1 to 12 of Column 1 of this table (Schedule 2), where that development is already authorised, executed or in the process of being executed.'

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	New combined site area approximately 1.5 ha (an increase of 0.8ha).
Development Nature / Scale	<p>Proposed changes to the waste site (from that previously permitted) include:</p> <ul style="list-style-type: none"> - additional existing buildings/units to provide staff offices and welfare facilities (approximately 480m² of floorspace); - a physical extension of the site to the north and east of approximately 25 - 40m (or approximately 0.6ha) enclosed landscaped bund, retaining concrete wall and perimeter fence (combined approximately 3.5m wide and 3m in height); - an acoustic fence 3.5m in height adjacent to Elbridge Farm Cottages; - addition of material storage bays (typically 3.2m high, 3.5m wide and 6m deep), including an increase in height to 4m proximate to Elbridge Farmhouse; - internal rearrangement/reorganisation of waste sorting/storage areas within buildings and re-siting of plant and equipment within the expanded area of the site; - Minor changes to elevations of existing buildings and addition of a scaffold/sheet roof structure over the waste unloading area (9m in height); - Rearrangement/relocation and reduction of prefabricated office/welfare buildings and provision of a standalone 'picking line' structure (approximately 3m x 3m and 4.5m in height); - Installation of a water mist cannon and water supply tank (approximately 5.25m in height and 3m in width); - Amendments to staff and HGV parking layouts and introduction of a one-way circulation system around the site; - Resurfacing of the internal shared estate road, provision of an entrance swing barrier, and installation of a wheel wash facility; and - Area of access road between the A259 and Business Centre entrance resurfaced, widened, and cyclist priority introduced through markings/signage; <p>The proposed new facility would have a maximum permitted throughput of waste up to 75,000 tonnes/annum. The types of waste permitted to be managed at the site would not change (no hazardous or odorous wastes), nor would the hours of operation.</p>

Screening Criteria	Applicable (and explanation of reasons)?	Is a significant effect likely (and explanation of reasons)?
Natural Resources		

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1. Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	Yes. The proposals include the addition of a perimeter bund.	No. The scale and extent of the bund proposed, in the context of the existing surroundings would not result in significant effects within the meaning of the regulations.
2. Will construction or operation of the project use natural resources above or below ground such as land, soil, water, materials/minerals or energy which are non-renewable or in short supply?	Yes. The proposals involve the loss of greenfield, high-quality agricultural land (grade 1). Operation of the facility results in the use of fossil fuels and energy to power plant and buildings.	No. The scale of the proposed site and extent of agricultural soils impacted is relatively limited. Whilst the site would use energy, it is not considered a particularly intensive use. In the context of the existing site, the proposed expansion is unlikely to result in significant effect on the use of natural resources.
3. Are there any areas on/around the location which contain important, high quality or scarce resources which could be affected by the project, e.g. forestry, agriculture, water/coastal, fisheries, minerals?	No.	No.
Waste		
4. Will the project produce solid wastes during construction or operation or decommissioning?	Yes. The proposals involve the management of waste, including sorting, bulking, recycling and export off site.	No. Overall, the proposals seek to move the management of waste up the hierarchy and thus likely to be beneficial in terms of waste production considerations.
Pollution and Nuisances		
5. Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes. Temporary emissions may occur during construction including dust associated with earthmoving. During operation the proposals involve the crushing, screening, grading and storage of waste materials in the open. This includes construction and demolition waste and	No. Whilst some emissions to air inevitable, this would be localised and typical dust control measures proposed would reduce the potential for emissions. This would also be subject to typical operational controls (and would also be regulated by the Environment Agency under an Environmental Permit) thereby minimising

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	concrete products. Such operations can give rise to emissions to air.	potential for impacts. On balance, whilst dust emissions are a key consideration to be addressed by the planning application, the potential for impacts is not considered significant within the meaning of the regulations.
<p>6. Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?</p>	<p>Yes.</p> <p>Likely during operation as there would be movements of machinery and waste around the site, and the use of plant such as a crusher and screener in the open.</p> <p>Lighting proposed, albeit of limited extent and consistent with existing lighting provision.</p>	<p>No.</p> <p>There would inevitably be potential for adverse effects resulting from the proposed activities, albeit relatively localised. The noisiest plant would be located as far as practicable away from neighbouring properties.</p> <p>A Noise Survey has been submitted concluding noise impacts would not be significant subject to suitable mitigation including boundary treatments and operational controls.</p> <p>Significant effects are not considered likely with imposition of typical controls such as over hours of operation, lighting, and noise mitigation measures. Such matters would also be regulated by the Environment Agency (under an Environmental Permit) thereby minimising potential for impacts.</p> <p>On balance, whilst potential for noise and light emissions are a key consideration to be addressed by the planning application, the potential for impacts is not considered significant within the meaning of the regulations.</p>
<p>7. Will the project lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?</p>	<p>Yes.</p> <p>The site would process waste, and in greater volumes than currently takes place. There would be the potential for leaching of materials into surface water.</p>	<p>No.</p> <p>No hazardous waste processed, and any non-inert waste would be managed within buildings. Construction, excavation, and demolition waste stored outside would be inert.</p> <p>Operations on the site would be</p>

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		subject to typical planning conditions to ensure 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>8. Are there any areas on or around the location which are already subject to pollution or environmental damage, e.g. where existing legal environmental standards are exceeded, which could be affected by the project?</p>	<p>No. Albeit reports of noise and dust emissions received in relation to existing operations.</p>	<p>No. See Q5 and Q6 also.</p>
Population and Human Health		
<p>9. Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?</p>	<p>No. Risk of accidents would be low and likely to centre around typical use of plant and HGV traffic. Limited potential for fire risk.</p>	<p>No. The risk of accidents is considered relatively low. The site would be subject to Health and Safety requirements as regulated by the Health and Safety Executive. The facility would also require an Environmental Permit (regulated by the Environment Agency) that would review appropriate fire prevention measures. On balance, the potential for impacts is not considered significant within the meaning of the regulations.</p>
<p>10. Will the project present a risk to the population (having regard to population density) and their human health during construction, operation or decommissioning? (for example due to water contamination or air pollution)</p>	<p>Yes. See Q5 also.</p>	<p>No. The proposals are for the expansion of an established waste management facility. The facility would also require an Environmental Permit (regulated by the Environment Agency) that would control emissions to acceptable limits. See Q5 also. On balance, the potential for impacts is not considered</p>

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		significant within the meaning of the regulations.
Water Resources		
<p>11. Are there any water resources including surface waters, e.g. rivers, lakes/ponds, coastal or underground waters on or around the location which could be affected by the project, particularly in terms of their volume and flood risk?</p>	<p>Yes.</p> <p>A main watercourse borders the north-western boundary of the site including a pond in close proximity. The site is mainly within flood zone 1, however, proximate to the watercourse includes areas within flood zones 2 and 3 at a greater risk of flooding.</p> <p>Drainage proposals provide for catchment/management of surface/operational water.</p>	<p>No.</p> <p>The nature/scale of the proposals, context of existing operations, typical drainage requirements to be addressed as part of the planning application, and controls required by other regimes are such that they are unlikely to result in potential for significant effects on water resources or flood risk.</p>
Biodiversity (Species and Habitats)		
<p>12. Are there any protected areas which are designated or classified for their terrestrial, avian and marine ecological value, or any non-designated / non-classified areas which are important or sensitive for reasons of their terrestrial, avian and marine ecological value, located on or around the location and which could be affected by the project? (e.g. wetlands, watercourses or other water-bodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).</p>	<p>Yes.</p> <p>See Q11 also.</p> <p>The Brooks Local Nature Reserve (LNR) approximately 1.5km to the east.</p>	<p>No.</p> <p>Given the scale and nature of the proposals and separation distances involved, the proposals would unlikely have any direct or significant impacts on these features.</p>
<p>13. Could any protected, important or sensitive species of flora or fauna which use areas on or around the site, e.g. for breeding, nesting, foraging, resting,</p>	<p>Yes.</p> <p>Potential for protected species to be present around the site, in particular along watercourses to the north and west of the site.</p>	<p>No.</p> <p>Preliminary surveys suggest that there is limited potential for impacts on protected species, subject to sensitive construction techniques/lighting arrangements and provision of</p>

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over-wintering, or migration, be affected by the project?		<p>proposed landscaped bund. There is some potential for Water voles and a possible need for further surveys.</p> <p>Taking into account the limited presence and potential for impacts on sensitive species, the limited extent of any habitat that may be affected, and typical controls that could be secured via the planning application process, it is not considered there is potential for significant impacts within the meaning of the regulations.</p>
Landscape and Visual		
<p>14. Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? Where designated indicate level of designation (international, national, regional or local).</p>	<p>No.</p> <p>Albeit the site is within the 'countryside' and proposed extension within an area identified in the Local Plan as an undeveloped 'gap between settlements' which are important to prevent the coalescence of settlements.</p>	<p>No.</p> <p>The limited scale, height and extent of the proposed development in the context of the existing waste site and surrounding built development is such that any impacts would not be considered significant within the meaning of the regulations.</p>
<p>15. Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)</p>	<p>No.</p> <p>Some views possible from a limited number of properties and adjacent businesses to the south, and from rear of properties further afield to the east.</p> <p>Some long-distance views of the site possible from the North Bersted Bypass. Further, views of the access, and some internal parts of the site are possible from the A259 (a well trafficked road).</p>	<p>No</p> <p>A limited number of properties proximate to the site, that is generally well screened from public views by existing trees/hedgerows and boundary treatments.</p> <p>Views from the highway are generally limited (with the exception of an established shared access) and transitory in nature.</p>
Cultural Heritage/Archaeology		
<p>16. Are there any areas or features which</p>	<p>Yes.</p>	<p>No.</p>

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<p>are protected for their cultural heritage or archaeological value, or any non-designated / classified areas and/or features of cultural heritage or archaeological importance on or around the location which could be affected by the project (including potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).</p>	<p>The site falls within an Archaeological Notification Area i.e. an area with a high potential for buried archaeology of significance to be present</p>	<p>The proposed extension area is limited in size, and limited groundworks proposed minimising any potential for impacts on underlying archaeology.</p>
Transport and Access		
<p>17. Are there any routes on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?</p>	<p>Yes. The site crosses a designated cycle path and in relatively close proximity to bus stops on the A259.</p>	<p>No. The scale of the proposal in the context of an established access to the site, and proposed provision of updated measures to manage any potential conflicts, is such that there is not potential for significant impacts within the meaning of the regulations.</p>
<p>18. Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?</p>	<p>Yes. The site is accessed from the A259 via a short section of highway providing a shared access. The proposals could result in up to 90 additional HGV movements a day (45 in and 45 out).</p>	<p>No. Although the proposals could result in additional HGV movements, in the context of established vehicular movements to/from the wider site and noting that the A259 forms part of the lorry route network, it is not considered that the potential uplift in HGV movements would have the potential for significant effects within the meaning of the regulations.</p>
Land Use		
<p>19. Are there existing land uses or community facilities on or around the location which could be affected by the project? E.g. housing, densely populated areas, industry</p>	<p>Yes. While there are a number of isolated dwellings in close proximity to the site, it is located within an established business park with various</p>	<p>No. The site is located outside the built-up area, is relatively distant from densely populated areas, and is within a wider site with established</p>

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/ commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.	B2 and B8 uses. A motor sales/garage lies to the west of the site on the opposite side of the A259. Land to the north and east (wherein the extension is proposed) is agricultural land.	waste/storage/business uses. The extension area sought is modest in relation to agricultural land affected.
20. Are there any plans for future land uses on or around the location which could be affected by the project?	Yes. A significant area of Land to the southwest of the A259 is subject to a strategic allocation 'Land West of Bersted' in the local plan for up to 2500 dwelling, employment provision and associated community infrastructure.	No. The extant waste uses and business park already present and are safeguarded as such. Potential interactions would form part of consideration of any future planning application. Although the strategic development could bring large scale residential development closer to site than is currently the case, the potential risk to people and the environment would be limited by separation distances and other regulatory regimes, including Environmental Permitting. Significant impacts within the meaning of the regulations are not anticipated.
Land Stability and Climate		
21. Is the location susceptible to earthquakes, subsidence, landslides, erosion, or extreme /adverse climatic conditions, e.g. temperature inversions, fogs, severe winds, which could cause the project to present environmental problems?	No.	No.
22. Is there potential for the development to impact upon the climate (for example through the nature and magnitude of greenhouse gas emissions)?	Yes. The proposed development would result in the use of fossil fuels (including in plant and any associated vehicular movements) and use of energy, thus have the potential for emission of greenhouse gasses.	No. Given the context of established uses and scale/nature of the proposals (which include the management of waste higher up the hierarchy and manging waste close to source), no significant effects anticipated within the meanings of the

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		regulations.
Cumulative Effects		
23. Could this project together with existing and/or approved development result in cumulation of impacts together during the construction/operation phase?	<p>Yes.</p> <p>During construction, there is potential for development to act cumulatively with existing operations (albeit likely requiring similar plant to that already operated on site).</p> <p>During operation there is potential for any emissions/amenity/highway impacts to act cumulatively or in combination with existing waste management/business uses within the wider site.</p>	<p>No.</p> <p>Whilst there is potential for cumulative impacts with existing and neighbouring developments, the scale and nature of the proposal, the context of existing surrounding uses/environs, and mitigation/controls that could be secured via planning and Environmental Permitting regimes is such that it is not considered the development would be likely to result in significant effects within the meaning of the regulations.</p> <p>See also 'Pollution and Nuisances' and 'Transport and Access' sections above.</p>
Transboundary Effects		
24. Is the project likely to lead to transboundary effects?	<p>No.</p> <p>Any impacts likely to be localised.</p>	No.

Conclusion

Planning Practice Guidance (PPG) on Environmental Impact Assessment (March 2015) sets out 'Indicative screening thresholds' for considering whether EIA is necessary. For Installations for the disposal of waste (Part 11(b)) thresholds suggest EIA may be more likely for proposals with a new capacity of over 50,000 tonnes per annum, or on a site of 10Ha 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 key issues to consider noted in these thresholds, are the scale of the development and the nature of the potential impact in terms of discharges, emissions, or odour.

In this case, the proposals involve an increased maximum throughput of waste up to 75,000 tonnes per annum (exceeding the 50,000tpa indicative threshold), however, on a site totalling 1.5Ha in area (significantly below the 10Ha indicative threshold) and most of the waste managed would be inert. The proposed development is for the expansion of an established waste facility with the physical extension (approximately 0.8ha) and additional physical built development being of a limited scale, and with boundary treatments proposed to provide containment. It is of further note that any impacts arising from the site would be experienced in the context of an established business centre and waste uses, that influence the environmental sensitivity of the locality.

There is potential for contaminated discharges/sediments to the water environment associated with the storage and processing of waste and materials. However, the proposals provide for catchment, containment, and management of surface/operational water, that subject to detailed review and controls as part of a planning application typically ensure any discharges are managed without resulting in significant environmental impacts. Such controls would also be regulated by the Environmental Permitting regime (the regulator for which is the Environment Agency), thereby minimising the potential for significant effects from discharges.

There is potential for other emissions, in particular dust and noise. Noting typical operational dust control practices, physical noise containment measures proposed, the requirement to adhere to environmental permit requirements, the limited number of sensitive receptors proximate to the site, and context of the existing waste facility, it is not considered emissions have the potential for significant effects within the meaning of the regulations.

The proposals clearly have the potential for environmental impacts. However, the scale, nature and location of the proposed development is such that in the context of established waste management/industrial uses, it is considered that these are unlikely to be of a magnitude that would lead to significant environmental effects.

The applicant has provided detailed environmental surveys/assessments in accordance with relevant guidance, and mitigation measures typical of a development of this nature, all of which will be fully considered as part of the current planning application. It is considered that such measures would reduce the probability of impacts, and/or likely be capable of suitably reducing or offsetting them such that they would not be significant within the meaning of the regulations.

The nature of the works would require further consent under other regulatory regimes administered by the Environment Agency to minimise and limit emissions. It can be assumed that these regimes will operate effectively thus further minimising the probability of any environmental impacts.

Considering the findings set out above and having regard to the selection criteria in Schedule 3 of the EIA Regulations, it is considered that the proposed development does 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 **would not require** an Environmental Impact Assessment.



Approved by:

On behalf of the Head of Planning Services

Date: 4 August 2023

Case Officer: James Neave (Principal Planner)