

Request for Screening Opinion under Regulation 6 of the Town and Country  
Planning (Environmental Impact Assessment) Regulations 2017

Proposal : Screening Opinion

<b>Date of initial request:</b>	03/07/2018
<b>Further information received:</b>	N/A
<b>Deadline for response:</b>	23/07/2018

Recommendation & Key Reasons

The proposed scheme is for residential development of 132 dwellings. The proposed development does exceed the relevant thresholds stated in Schedule 2 of the EIA Regulations. These areas have been addressed in line with the EIA Regulations and Government guidance and it has been concluded that likely significant effects would not occur. It is therefore recommended that the proposed scheme does not constitute EIA development.

The proposal is considered to fall within EIA Regulations, Schedule 2 paragraph 10 (b) (iii).

The proposed scheme exceeds the relevant thresholds given in Schedule 2 of the EIA Regulations for urban development projects as the overall area of the development exceeds 5 hectares.

The proposed scheme does exceed relevant threshold (i – site area exceeds 5 hectares) for urban development projects set out in the indicative screening thresholds given in the official guidance on EIA (NPPG) in the Government's Environmental Impact Assessment Annex. However, the scheme would not exceed relevant thresholds: (ii) it does not provide more than 10,000m<sup>2</sup> of commercial floorspace, and (iii) it would not have significant urbanising effects in a previously non-urbanised area (e.g. it does not comprise a new development of more than 1,000 dwellings).

<b>Principal party to be notified:</b>	Savills
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Description of the proposal

Physical development

The proposed scheme is for residential development of 132 dwellings.

Location of proposal:

The site is located on the northern side of Hurtmore Road and comprises a playing field which is owned by, and used in connection with, Charterhouse School. Charterhouse School is located on the opposite side (to the south) of Hurtmore Road. The surrounding area is primarily residential in nature, with the site bordered on three sides by residential properties and their amenity space.

Considerations against Schedule 1 and Schedule 2 of the EIA Regulations

Is the proposal listed in Schedule 1?

The scheme would not involve a form of development listed in Schedule 1.

Is the proposal listed in Schedule 2?

With reference to the National Planning Policy Guidance (NPPG) 2014 the proposal is considered to fall within EIA Regulations, Schedule 2 paragraph 10(b) urban development project.

Does the proposal exceed the relevant thresholds given in the EIA regulations?

The proposed scheme exceeds the relevant thresholds given in Schedule 2 of the EIA Regulations for urban development projects (10b), as the proposal would exceed 5 hectares.

Does the proposal exceed the relevant thresholds given in the official guidance on EIA (NPPG)?

The proposal would exceed the relevant threshold (i) of a site area greater than 5 hectares.

The proposal would not provide a total of more than 10,000m<sup>2</sup> of new commercial floorspace, so would not exceed threshold (ii).

The proposal would not comprise development which would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings), so would not exceed threshold (iii).

Is the proposal in or adjacent to a sensitive area as defined in Schedule 2 of the EIA Regulations?

The application site does not fall within a sensitive area. However, it does fall within the 5km Buffer Zone of the Wealden Heaths I SPA.

Is the proposal in or within 2.5km of a site designated under the Birds Directive (SPA) the Habitats Directive (SAC) or the Ramsar Convention?

The site is located approximately 4.2km from the Thursley, Hankley & Frensham Commons SPA and 4.2km from the Thursley, Ash, Pirbright & Chobham SAC. It is 5.7km from the Thursley & Ockley Bogs (Ramsar).

In addition, the site is located approximately 0.7km from the Charterhouse to Eashing Site of Special Scientific Interest (SSSI), 2.2km from the Wey Valley Meadows SSSI, 3.9km from the Puttenham & Crooksbury Commons SSSI, and 4.2km from the Thursley, Hankley & Frensham Commons SSSI.

In light of the distances, it is considered that an Appropriate Assessment under the Habitat Regulations is required.

Is the proposal in or adjacent to other potentially sensitive areas, such as local designations, protected species, contaminated land, etc?

The site falls within an Area of Great Landscape Value (AGLV).

An area of land to the west of the site, approximately 180m away from the site (Robins and Day car garage), comprises potentially contaminated land.

At its closest point, the site lies approximately 0.8km to the north of a Site of Nature Conservation Importance (SNCI). An additional SNCI is located 1.2km to the south east of the site.

The site is located approximately 3.8km from Rodborough Common Local Nature Reserve (LNR) and 4.8km from Chinthurst Hill LNR.

#### Screening Checklist for Schedule 2 Projects (from EIA Regulations Schedule 3)

The likely significant effects of the development on the environment have been considered in relation to the following types and characteristics (as set out in part 3, schedule 3 of the EIA Regulations) when assessing the selection criteria below:

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
- (b) the nature of the impact;
- (c) the transboundary nature of the impact;
- (d) the intensity and complexity of the impact;
- (e) the probability of the impact;
- (f) the expected onset, duration, frequency and reversibility of the impact;
- (g) the culmination of the impact with the impact of other existing and/or approved development;
- (h) the possibility of effectively reducing the impact.

## Characteristics of the proposed scheme

Screening Criteria	Would the size of the proposed scheme be in keeping with the context in which it would be located
<b>Scheme characteristics</b>	
<p>The development would be located on a currently open area of grassland, which is used as playing fields by the School. The character of this parcel of land would be significantly changed. However, it is noted that, whilst the site falls within the Green Belt, it is nevertheless bordered on three sides by residential development. As such, it is considered that the introduction of dwellings would not be so out of keeping with the wider context in which it would be located to require an Environmental Statement on these grounds.</p>	
<b>Characteristics of potential impacts</b>	
<p>No significant impacts in EIA terms are anticipated?</p>	

Screening Criteria	Would the proposed scheme cumulate with other development?
<b>Scheme characteristics</b>	
<p>The following permission relates to a site which exceeds 5 hectares, and would therefore comprise Schedule 2 development:</p> <p>WA/2012/1592 – Milford Hospital, Tuesley Lane, Godalming  Outline application for demolition of existing buildings and redevelopment of land to provide 104 new (Class C3) residential units, works to 12 existing residential units (The Crescent), works to Allison House and staff cottages to provide 4 (Class C3) residential units, access and diversion of Public Footpath 161, Busbridge.  * This scheme was built out subsequent to reserved matters approval under WA/2013/1926.</p> <p>There are other major development proposals within close proximity of the application site which, whilst they are in themselves not Schedule 2 development, should nevertheless be considered:</p> <p>WA/2012/1078 - Wurth House and Anvil Park, Catteshall Lane, Godalming  Erection of 147 dwellings together with vehicular access, associated parking and landscaping following demolition of existing buildings. This application is accompanied by an Environmental Impact Assessment (EIA).</p> <p>CR/2018/0007 - Westbrook Mills, Borough Road, Godalming  Prior Notification Application G.P.D.O. Part 3, Class O - Change of use from Use Class B1a (office) to Use Class C3 (residential) use to provide 120 dwellings  * This follows previous prior notification applications and an appeal decision, all for less than 100 units.</p> <p>WA/2012/0453 – Land at Flambard Way, Catteshall Lane, Godalming (Godalming Key Site)  Erection of 137 dwellings comprising 35 houses and 102 apartments together with associated highway access and landscaping following demolition of existing buildings. (As amplified by additional information received 16/05/2012; additional plan and letter received 01/06/2012; additional information received 02/07/2012 and</p>	

10/07/2012 and emails received 18/07/2012). This application is accompanied by Environmental Impact Assessment (EIA).

WA/2014/0932 – Land at Ockford Ridge, Godalming  
 Hybrid Planning Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for the erection of 99 dwellings following demolition of 65 dwellings and associated works comprising a Full Planning Application for Phase 1 (Site D) for 16 dwellings and Outline Planning Permission for Phase 2 (Sites A, B and C) for 83 dwellings with appearance, landscaping, layout and scale matters reserved for future consideration (as amended by plans received 09/07/2014).

None of the abovementioned development proposals comprise significant extensions to the developed area; they are all seen within the context of surrounding built form comprising the low density, market town of Godalming. Given the spatial disparity of the abovementioned development proposals in relation to the current scheme, it is considered that the proposed scheme would not be seen in accumulation with other development.

Characteristics of potential impacts

No significant impacts in EIA terms are anticipated

Screening Criteria	Would the proposed scheme involve the use of natural resources?
Scheme characteristics	
It is considered that the proposal would not result in the loss of soil, land, water or biodiversity.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme produce large volumes of hazardous types of wastes?
Scheme characteristics	
It is considered that the proposal would not produce large volumes of hazardous waste.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have the capacity to give rise to pollution or nuisance?
Scheme characteristics	
It is not anticipated that the development would have the capacity to give rise to pollution or nuisance in the long term. There would be likely short term impacts during the construction and operational phases of the development; however, these would be transient and not of a significant scale. Further, such impacts would be controlled by a Construction Environmental Management Plan.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme present risks of accidents?
Scheme Characteristics	
The proposal would not involve any dealings with hazardous material or substances. Further, effective site management should deal with any risks during the construction process.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

#### Sensitivity of proposed location

Screening Criteria	Would the proposed scheme be compatible with existing land use at the intended site and adjacent areas?
Scheme characteristics	
The existing site comprises an open playing field. The proposal would introduce residential development into this area and, as such, there would be an inherent material change of use of the land. However, the site falls adjacent to existing residential built form. It is considered that the proposed scheme would therefore be compatible with the surrounding land uses.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for the relative abundance, quality & regenerative capacity of the area's natural resources?
Scheme characteristics	
The existing site comprises an open playing field. The scheme would introduce residential development into the area. However, it is anticipated that the scheme would not result in any material impact on the abundance, quality and regenerative capacity of the area's natural resources. Any likely impacts would be controlled by agreed working practices, mitigation and enhancement measures.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for the integrity of any wetlands?
Scheme characteristics	
No implications.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for the integrity of any woodland areas?
Scheme characteristics	
Whilst the site contains trees subject of a TPO along the northern and eastern boundaries, it does not include or is not located immediately adjacent to any Ancient Woodland. It is therefore considered that the scheme would not result in any material impact on the integrity of surrounding woodland areas.	
Characteristics of potential impacts	

No significant impacts in EIA terms are anticipated.

Screening Criteria	Would the proposed scheme have implications for the integrity of any nature reserves or parks?
Scheme characteristics	
No implications.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposal scheme have implications for the integrity of any Site of Special Scientific Interest (SSSI)?
Scheme characteristics	
At its closest point, the site is located approximately 0.7km from the Charterhouse to Eashing SSSI. There are additional SSSIs located at greater distances from the site. Given the distance however, it is considered that the scheme would not have any material impact on the integrity of the SSSI.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for the integrity of any Special Protection Area (SPA) &/or Ramsar site?
Scheme characteristics	
The site is located approximately 4.2km from the Thursley, Hankley & Frensham Commons SPA and 5.7km from the Thursley & Ockley Bogs (Ramsar). Any likely harm to the SPA would need to be avoided or mitigated. It is considered that the site would be sufficient distance away from the Ramsar.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for the integrity of any Special Area of Conservation (SAC)?
Scheme characteristics	
The site is located approximately 4.2km from the Thursley, Ash, Pirbright & Chobham SAC. Any likely harm to this area would need to be avoided or mitigated.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for any areas where environmental quality standards are already exceeded?
Scheme characteristics	
No implications.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Screening Criteria	Would the proposed scheme have implications for any densely populated areas?
Scheme characteristics	
It is considered that the proposed scheme would not result in any material implications for the populated area of Godalming.	

Characteristics of potential impacts
No significant impacts in EIA terms are anticipated.

Screening Criteria	Would the proposed scheme have implications for the integrity of any landscapes of historical, cultural or archaeological significance?
Scheme characteristics	
The site is located approximately 1.9km from a Scheduled Monument (an old Anglo-Saxon fort). The site is sufficiently located from the Godalming Conservation Areas such that there would be no material impact on the integrity of these areas. Given the size of the site, archaeological investigations would be required. Any likely impact could be controlled by working practices.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated.	

Considerations of possible impacts on the environment & human population

Issue	Comments	Significance of risks
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Risks to the environment

Air quality	Low significance
The site is not located within an AQMA. Notwithstanding this, any likely impact on air quality would be transient and short term during the construction process. Any likely impact could be controlled by a Construction Environmental Management Plan.	
Archaeology & historic environment	Low significance
The site is not located within an area of high archaeological potential. However, due to the site size, investigative work would be required to be undertaken. It is not anticipated that the scheme would result in any material effect on archaeological remains.	
Climate change	Low significance
Having regard to the location of the site, adjacent to existing residential built form, it is considered that there would be no material effects with regard to climate change.	
Ecology	Low significance
Relevant ecological surveys would be required to be undertaken, having regard to the open nature of the site at present. Any likely impact could be controlled by agreed working practices, mitigation and enhancement measures.	
Geology & soils	Low significance
Hydrology & hydrogeology	Low significance
It is considered that any impact to ground levels and hydrology of the site would be likely contained to the site and there would be no resultant wider material impact.	



Landscape	Potential High significance
The site falls within the Green Belt and AGLV. It is considered that there is potential for the scheme to have a significant impact on the landscape. However, any likely landscape impact(s) would be demonstrated through a Landscape and Visual Impact Assessment (LVIA) and would be subject to review.	

Urban Environment	Low significance
Given that the site is bordered on three sides by existing residential development,	

Risks to the human population

Traffic	Low significance
Owing to the nature of the proposed scheme, there would be an increase in traffic levels within the vicinity. However, it is not anticipated that the scale of this increase would be so significant as to result in a material risk to the human population.	

Representations

50 letters have been received raising objection to the application on the following grounds:

- Change to the character of the area.
- The environmental impact would be significant.
- The site falls within the Green Belt and AGLV, it would be out of character to the local area.
- Urbanisation – the scenic approach to the historic town of Godalming would be replaced by a more urbanised feel.
- Increase in traffic and road safety issues.
- Insufficient parking provision.
- Poor public transport
- Increase in footfall of Mark Way.
- Increase in noise, light and air pollution.
- Increase in rainwater runoff.
- Increase in sewerage and waste.
- Reduction in property values on Mark Way.
- Loss of privacy to neighbouring properties.
- There are no Very Special Circumstances – expanding pupil numbers at Charterhouse does not meet the Government’s special circumstance definition of benefiting local community educational needs. Charterhouse has some of the highest termly fees in the country.
- Girls could be admitted to the school without expansion to the school, by reducing the number of boys admitted.

- The creation of additional permanent jobs is questioned.
- The patronage and alumni of Charterhouse can presumably raise money by other means. It is highly improbable that the school does not have access to other funding for its proposed expansion.
- It is a means of financial gain.
- The applicant failed to mention the submission of this application at a Public Exhibition.
- Impact to air quality.
- Impact to ecology.
- Damage to woodland.
- Impact on Listed Buildings and Conservation Area.
- It would be out of keeping with the surrounding low density housing.
- Short notice in respect of the public exhibition.
- Applications for private development in the Green Belt/AGLV have been turned down.
- Charterhouse development which has taken place has not been of the highest design or build quality.
- Loss of playing field – they receive significant use in the football and hockey seasons. If under utilised, they could be used as a public asset.
- Local services are already at full capacity.
- It cannot be considered in isolation from schemes already approved – new car park on Hurtmore Road, development below the brow of Charterhouse Road.
- The Council has already met its housing requirements within the scope of the new Local Plan. It is not a site which is included within the Plan.
- The proposal has already been considered and rejected in the Waverley Land Availability Assessment of May 2018.
- It has not been identified as an area which is potentially suitable for removal from the Green Belt through Local Plan Part 1.
- It should be subject to an EIA.
- The threshold of Schedule 2 of the EIA Regulations 2017 is clearly exceeded (5 hectare threshold).

Officers note the objections which have been made by third parties and would comment that the majority of objections which have been received are in relation to matters which would be assessed as part of any formal planning application. The current application relates solely to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; it does not seek planning permission for the proposed scheme, but rather confirmation as to whether any future planning application would need to be supported by an Environmental Statement. Officers have acknowledged within the report that the threshold of Schedule 2 with regard to the site area would be exceeded. However, this in itself does not result in the scheme being EIA development. All matters relevant to this assessment have been addressed within the report.

Comments from Thames Water

It is noted that Thames Water has referred to Schedule 4 of the EIA Regulations 2017 and is of the opinion that the following issues should be considered and covered in either an EIA or planning application submission:

1. The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
2. The surface water drainage requirements and flood risk of the development both on and off site and can it be met.
3. Build - out/ phasing details to ensure infrastructure can be delivered ahead of occupation.
4. Any piling methodology and will it adversely affect neighbouring utility services.

Officers consider that the abovementioned matters could be satisfactorily considered as part of any formal planning application submission.

**Recommendation**

That the proposed scheme does not constitute EIA development.

Case Officer                                  Signed: Rebecca Clarke          Date: 23/07/2018

Agreed by Team or DC Manager.....Date:.....

Time extension agreement in writing seen by signing off officer:

Yes                   No                   N/A

For Certificate of Lawfulness applications:                                  Use/Operations/Matter

Agreed by Legal services.....Date.....

Agreed by Development Manager or Head of Planning Services

.....

This report has been agreed under the delegated authority by the Head of Planning Services.

Decision falls within ....(*number reference*) of the Scheme of Delegation  
 ..... (initialled by Authorising officer)

Copy to Policy for SPA or infrastructure contributions?  No

Pass File to Enforcement  No

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Is there an extant Enforcement Notice in place for the same or similar development served no more than 2 years previously?

Does this application need to be referred to the Secretary of State in line with Town and Country Planning (Consultation) Direction 2009?

Notify Environmental Health Team of decision (send copy)

Is this subject to a legal agreement?

If yes, is there a signed copy on file?

Notify Legal Services of decision if approval and if subject to legal agreement (send copy)