

By Email

Head of Planning
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

FAO: Alison Webster, Senior Planning Officer (Email: alison.webster@gravesham.gov.uk)

Date: 24 October 2022

Our ref: 65610/01/NG/NWh/25874691v1

Dear Sir/Madam

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated)**Cascades Leisure Centre – Gravesend**

On behalf of our client, Gravesham Borough Council, we request that the Council provides a formal screening opinion to confirm if an Environmental Impact Assessment ('EIA') is required in respect of the proposed demolition of the existing Cascades Leisure Centre and public house at Thong Lane, Gravesend and the development of a new build leisure centre (of a similar size to the existing) with community pool, training pool, leisure water, café, soft play, 'clip n climb' facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios and 2 no. squash courts. This request is made in pursuance of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated) ('the 2017 EIA Regulations').

This submission meets the requirements of Regulation 6(2) of the 2017 EIA Regulations, as set out in Table 1 below.

Table 1 Screening Opinion Submission Requirements in accordance with Regulation 6(2) of the 2017 EIA Regulations

Regulation 6(2) requirements	Conformity
A plan sufficient to identify the land	Yes
A description of the development, including in particular:- i. A description of the physical characteristics of the development and, where relevant, of demolition works; ii. A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.	Yes
A description of the aspects of the environment likely to be significantly affected by the development	Yes

Regulation 6(2) requirements	Conformity
To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:- - The expected residues and emissions and the production of waste, where relevant; and - The use of natural resources, in particular soil, land, water and biodiversity	Yes
Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment	Yes

To enable your consideration of this issue, we set out below the following information: -

- 1 Description of the site and its surroundings;
- 2 Description of the proposed development; and
- 3 Review of the requirement for an EIA.

Item 3 is dealt with by reviewing the Site and its surroundings and a consideration of the issue set out in the 2017 EIA Regulations.

This request for a Screening Opinion is accompanied by the Site Location Plan (drawing ref. 3929-ASP-ZZ-A-0301-AS 1).

To summarise, we consider that the Proposed Development will not give rise to a need for EIA. We outline below the analysis undertaken to reach this conclusion.

1. Description of the Site and its Surroundings

The Site is located to the east of Gravesend and is approximately 3.77 ha in size. It comprises the existing two storey (12m) Cascades Leisure Centre building (c. 7,500 sq m); a public house (c. 200 sq m); grassed areas; an area of hardstanding making up a car park of 158 parking spaces; an internal access road; and a children's play park.

The Site sits 67m above sea level on a small flat plateau that previously served Gravesend Airport and latterly as RAF Gravesend. The site is minerally rich and sits on a high purity chalk bed close to the common clay and shale found at Shorne Wood and the sand and gravels around Green Lane.

Existing vehicular access and egress to the Site is from two points on Thong Lane and a one-way route through the Site. Thong Lane connects to the A2 arterial road to the south and Gravesend to the north. The Site is approximately 2.5km inland of the southern bank of the River Thames, some 35 km from Central London (to the west); and is close to Tilbury on the northern bank of the River Thames in Essex.

The Site sits on the Urban/Rural boundary as well as being located within the Metropolitan Green Belt.

Further north of the Site lies the village of Chalk, which adjoins the eastern edge of Gravesend. Immediately opposite the Site (on the western side of Thong Lane) is the Riverview Park neighbourhood of greater Gravesend which largely comprises detached and semi-detached residential properties of up to two storeys in height. Approximately 200m north of the Site are two residential properties (semi-detached) on the eastern side of Thong Lane.

Adjacent to the Site to the north is the Gravesend Golf Centre and the Gravesend Model Marine and Engineering Society Amusement Park Ride (a model railway). Immediately to the west is the Legends Sport Centre, which houses the Riverview Football Club and the Record Tennis Centres. To the south of the site is the Southern Valley Golf Club. Beyond these sport and leisure uses immediately surrounding the site, the area comprises farmland and woodland to the north, east and south of the Site, with the next neighbouring village, Shorne, approximately one mile to the south east.

Gravesend railway station is approximately three miles from the site (10 min journey by car), with services direct and high speed (HS1) services to London St Pancras International and other London stations. Two main bus routes (480 and 481) currently pass through the site, connecting Riverview Park with Gravesend Town Centre and onwards to Northfleet, Swanscombe, Greenhithe, Stone, Bluewater Shopping Centre and Dartford Town Centre.

The National Cycle Network Route 1 passes close to the south bank of the River Thames through Gravesend Town Centre to the north of the site whilst Route 177 passes parallel with the A2 arterial road to the south of the site.

The Lower Thames Crossing is a designated Nationally Significant Infrastructure Project but an application for the proposal has not yet been accepted by the Planning Inspectorate.

The site is located within an Area of Archaeological Notification and is adjacent to, but not within, the Higham Arable Farmland Landscape Character Area. It is also within the SSSI Impact Risk Zone (IRZ) of the Shorne and Ashenbank Woods SSSI which is approximately 800m south of the Site and the Thames Estuary and Marshes Ramsar site, located 1,700m to the north.

The nearest listed buildings to the site are the Grade II Listed Baynards Cottage and the Grade II Listed White Horse Cottage. There are no Locally Listed buildings in proximity to the Site.

The entire site is located within Flood Zone 1 (Low Probability) on the Environment Agency (EA) Flood Map for Planning.

2. Description of the Proposed Development

The detailed design and layout of the Proposed Development is still to be finalised; however sufficient detail is known to inform this screening process. In brief, the Proposed Development comprises the demolition of the existing leisure centre and public house. The Site will be redeveloped to provide a new build leisure centre (of a similar size to the existing) with community pool, training pool, leisure water, café, soft play, 'clip n climb' facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios and 2 no. squash courts.

The Proposed Development will comprise of up to 7,500 sq m of floorspace. The building will not exceed 13.5m in overall building height.

Primary vehicular access to the Site will continue to be made via Thong Lane. Approximately 320 car parking spaces will be provided on site.

A detailed planning application will be submitted in respect of the above development.

3. Requirement for EIA

The development is one to which the EIA Regulations applies because it falls within Part 10(b) of Schedule 2 as an 'urban development project' where the overall area of the development exceeds 5 hectares. For Schedule 2 developments, the Regulations require that an EIA be undertaken where "*the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location*".

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to the selection criterion Schedule 3 of the Regulations, which are:-

- 1 **Characteristics of the development** (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health)
- 2 **Location of the development** (by reference to the environmental sensitivity of the area)
- 3 **Types and characteristics of the potential impact** (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility)

We deal with each issue below.

Development Characteristics:

Size and design of the development

The proposed floorspace and height of the Proposed Development is largely unchanged to the current form of the buildings. The overall land use of the Site will be unchanged. As a result, the Proposed Development is unlikely to give rise to significant environmental effects in relation to its size or design.

Cumulation with other development

The Site is an existing leisure centre and following a search of the Site's planning history, there are no active applications at the Site. An application was approved by Kent County Council (KCC) ref. KCC/GR/0113/2021 for the construction of a new two-storey science block at Thamesview School on Thong Lane, approximately 450m from the Site. The proposals have been brought forward to facilitate the school's expansion from 6FE to 7FE.

It is envisaged that all developments being brought forward within the area will be subject to appropriate management plans and embedded mitigation during their construction and operation to ensure that significant environmental effects do not arise. As a result, and considered cumulatively, it is not considered that any unusual or significant effects would arise when the Proposed Development is considered cumulatively with other schemes nearby that would give rise to a need for EIA.

Use of natural resources, in particular, soil, land, water, biodiversity

The Proposed Development would not deplete natural resources in a way which would have the potential to give rise to significant environmental effects requiring EIA.

Production of waste

The Proposed Development will generate waste during the operation and construction periods; however, this is not expected to be at a level that will give rise to significant adverse impacts on the environment due to the nature of the proposed leisure use. Waste generated during the construction period will be minimised and recycled as appropriate. This is therefore not considered to have a significant impact that should give rise to the need for EIA.

Risk of major accidents and/or disasters

The Proposed Development is not considered likely to give rise to the potential for risks from accidents, pollution and nuisances or the significant use of natural resources which would give rise to the need for EIA. The Proposed Development is for leisure use and is therefore not expected to generate or attract hazardous loads during construction or operation.

During construction, good practice measures will be observed to minimise the risk of construction accidents.

The Site is deemed to be of a low risk of fluvial, groundwater, or surface flooding. To ensure that the Proposed Development will not increase the flood risk elsewhere, surface water discharge from the Site will be controlled.

Pollution and nuisances

During construction, traffic, dust or other emissions will be managed through standard best practice construction measures which can be considered to be embedded. However, there is a low to moderate risk of direct contact, ingestion and inhalation of dust and vapours by maintenance workers during any future sub-surface works at the Site; and of vertical and lateral migration of ground gases.

The operation of HGVs and other vehicles during the operation of the Site is not considered to have a significant impact in terms of noise or emissions on the area that should give rise to the need for EIA.

Risk to human health

There is considered to be a low level of risk to human health (for example, due to water contamination or air pollution) as a consequence of the Proposed Development. Any potential risks to human health during construction (for instance through dust soiling) will be managed through standard best practice measures.

In summary, it is considered that the development characteristics of the site are unlikely to give rise to the need for an EIA.

Environmentally Sensitive Location

The Site is not in, or partly in a 'sensitive area' as defined by Regulation 2 (1) of the EIA Regulations..

The Site is designated as being within the SSSI Impact Risk Zone of the Shorne and Ashenbank Woods SSSI which is of interest due to its woodland habitat and native invertebrate species; the site is over 800 metres to the south of the Site.

Environmental Effects

The PPG provides a template of an EIA Screening Checklist, and states (PPG Doc Ref: ID 4-018-20170728):

“While there is no requirement to use a screening checklist, they can help to ensure that the relevant issues are considered and provide a clear audit trail.”

Therefore, to assist in consideration of the issues associated with the Proposed Development, we provide below a completed version of the EIA Screening Checklist to assist the Council in forming its EIA Screening Opinion.

Table 2 Completed EIA Screening Checklist (<https://www.gov.uk/government/publications/environmental-impact-assessment-screening-checklist>)

Case Details			
Applicant	Gravesham Borough Council	Brief description of the project / development	Redevelopment of the site to provide a new build leisure centre (of a similar size to the existing) with community pool, training pool, leisure water, café, soft play, ‘clip n climb’ facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios and 2 no. squash courts.
LPA	Gravesham Borough Council		
EIA Details			
Is the project Schedule 1 development according to Schedule 1 of the EIA Regulations?			No
If YES, which description of development (THEN GO TO Q4)			N/A
Is the project Schedule 2 development under the EIA Regulations?			Yes
If YES, under which description of development in Column 1 and Column 2?			10(b)(iii)
Is the development within, partly within, or near a ‘sensitive area’ as defined by Regulation 2 of the EIA Regulations?			No

If YES, which area?	N/A
Are the applicable thresholds/criteria in Column 2 exceeded/met?	Yes
If yes, which applicable threshold/criteria?	The overall area of the development exceeds 5 ha.

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)
	Briefly explain answer to Part 2a and, if applicable and/or known, include name of feature and proximity to site (If answer in Part 2a / 2b is 'No', the answer to Part 3a / 3b is 'N/A')	Is a significant effect likely, having regard particularly to the magnitude and spatial extent (including population size affected), nature, intensity and complexity, probability, expected onset, duration, frequency and reversibility of the impact and the possibility to effectively reduce the impact? If the finding of no significant effect is reliant on specific features or measures of the project envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment these should be identified in bold.

NATURAL RESOURCES

Will construction, operation or decommissioning of the project involve actions which will cause physical changes in the topography of the area?	No	No changes to the topography of the area are anticipated as a result of the development.	No	N/A
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Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
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?	No	The development makes use of land which has previously been developed (used as a car park serving the existing leisure centre) and will make use of existing natural resources. Assuming a worst-case scenario, construction of the development may be from non-renewable sources.	No	N/A
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	The Site is a brownfield site consisting in its majority of buildings and hardstanding.	No	N/A
WASTE				
Will the project produce solid wastes during construction or operation or decommissioning?	Yes	Waste will be generated during the demolition and construction of the development and during its operation.	No	Production of a Waste Management Plan in conjunction with or as part of a Construction Environmental Management Plan ('CEMP') will provide protocols for working with suppliers for the reduction of waste in packaging and in selection of materials. Such protocols will set out monitoring measures of waste production during construction. During operation, suitable waste recycling facilities will be made

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A		(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A	
				available. Significant effects are therefore not likely.
POLLUTION AND NUISANCES				
Will the project release pollutants or any hazardous, toxic or noxious substances to air?	Yes	Yes. the project is likely to make use of building services plant with emissions to air. Additional traffic associated with the proposed scheme will also generate pollution. It is not anticipated that the scheme will release any toxic or noxious substances to air.	No	A significant effect from emissions to air is not likely from the building services plant and emissions are likely to be no greater than from the existing leisure centre assuming a worst case scenario. The anticipated level of traffic associated with the proposed development would be similar to the existing leisure centre and would therefore not cause a significant effect on air quality.
Will the project cause noise and vibration or release of light, heat, energy or electromagnetic radiation?	No	The development is likely to make use of building services which generate noise, and activities within the proposed scheme will also generate noise. However, the development is unlikely to give rise to significant effects as it is expected that standard installation and construction techniques will allow noise emissions to be controlled such that a significant effect would not occur. The proposed development adopts a Passivhaus design and the noise and vibration levels	No	N/A

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A		(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A	
		will be less than that generated by the existing leisure centre.		
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?	No	Any contaminants identified will be treated and disposed of off-site in accordance with relevant regulations for disposal of hazardous waste. Furthermore, all materials to be exported from site will be subject to waste sampling and WAC testing prior to disposal. All surface water runoff from surfaces presenting a risk of contamination, such as car parks, will be subject to surface water treatment prior to discharge into the receiving water body in accordance with the National Planning Policy recommendations, Local Authority guidance and CIRIA SuDS Manual.	No	N/A
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?	No	No areas in close proximity to the Site exceed legal environmental standards which would be affected by the project	No	N/A

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A)	(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A)
POPULATION AND HUMAN HEALTH		
Will there be any risk of major accidents (including those caused by climate change, in accordance with scientific knowledge) during construction, operation or decommissioning?	No No anticipated risks of major accidents are anticipated.	No N/A
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)	No Appropriate management during construction will ensure impacts on the population are not significant. The redevelopment of the leisure centre, with upgraded facilities, will improve access to recreation for local residents and therefore could impact beneficially on health.	No N/A
WATER RESOURCES		
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?	No There are no such water resources on or around the location which are expected to be affected by the project. Measures will be undertaken to ensure that the development does not increase flood risk elsewhere.	No N/A
BIODIVERSITY (SPECIES AND HABITATS)		

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
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 waterbodies, the coastal zone, mountains, forests or woodlands, undesignated nature reserves or parks. (Where designated indicate level of designation (international, national, regional or local))).	No	There are no statutory or non-statutory nature conservation designations associated with the site. The nearest statutory sites are the Shorne and Woods SSSI located 800m south and the Thames and the Thames Estuary and Marshes Ramsar site located 1,700m north. The Site falls within the Impact Risk Zone of both these sites, however neither are likely to be affected by the development. Based on information that is currently available, the Site is poorly connected to habitats such as woodland (some poor connectivity to a woodland to the south) and wetland areas and is unlikely to be a suitable habitat for any amphibians, water voles/otters, badgers etc.	No	N/A
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, over-	Yes	Based on information that is currently available, on-site habitats such as the grassland margins have low suitability for reptiles, scattered trees, buildings and scrub for nesting birds and foraging bats.	No	The ecologist will embed measures into the design and management of construction and operational activities to ensure that no significant adverse effects on flora or fauna arise. This can be considered as embedded mitigation..

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)
wintering, or migration, be affected by the project?	The site boundaries are suitable for both badgers and hazel dormice. Evidence of badgers has been found on site and the tenuous, but present connectivity of the scrub and trees on the boundaries to a woodland to the south increase the chances that hazel dormice could be present.	
LANDSCAPE AND VISUAL		
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).	Yes The site sits within the Metropolitan Green Belt. The northern most extent of the Kent Downs AONB is located under 1km to the south-east and includes the Registered Park and Garden of Cobham Hall (Grade II*). There are a number of listed buildings within the study area, the closest of which are Church of St. Mary (Grade II*) c.1.3km to the north-east, Baynards Cottage (Grade II) c.1.3km to the south-east, White Horse Cottage (Grade II) c.1.1km to the south.	No The Proposed Development has been designed so as not to impact these views and to contribute sufficiently to their maintenance through soft landscaping. The existing landscape structure, which is of screening function, it's to be largely retained. No significant effects on the landscape or scenic value of the location is likely.
Is the project in a location where it is likely to be highly visible to many	No Through an initial bare earth TZVI study and visiting site, it is expected	No N/A

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?)) or N/A		(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?)) or N/A	
people? (If so, from where, what direction, and what distance?)		that despite the elevated location, from a quantitative perspective it is unlikely that the proposed building would be visible to many people due to onsite screening by trees and the existing tennis domes which are being retained. Qualitatively it is likely that views of the new building would be similar in extent to those of the existing building and tennis domes, however there is the opportunity for betterment through Incorporated Mitigation with the building form and elevational treatments working to recede into the landscape.		
CULTURAL HERITAGE/ARCHAEOLOGY				
Are there any areas or features which 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	No	The nearest listed buildings to the site are the Grade II Listed Baynards Cottage and the Grade II Listed White Horse Cottage (approximately 1.5km to the south east and 1km to the south respectively). There are no Locally Listed buildings in proximity to the Site. The site is located within an Area of	No	N/A

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)	(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)
potential impacts on setting, and views to, from and within)? Where designated indicate level of designation (international, national, regional or local).	Archaeological Notification.	
TRANSPORT AND ACCESS		
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?	Yes Thong Lane bounds the east of the Site.	No Protocols for minimising traffic disruption during the construction of the Proposed Development will be included in a Construction Environmental Management Plan that can be considered to be embedded mitigation. During operation, access by HGVs and other good vehicles will be managed. No significant effects are considered likely.
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?	Yes Thong Lane lies to the west of the site and the A226 to the north and the A2 to the south. The A226 and A2 are busy routes and are likely to experience some congestion from time to time during peak periods or when the network is experiencing re-routing due to accidents or broken down vehicles.	No The effect on the junctions at either end of Thong Lane is likely to be similar to the existing leisure centre and are unlikely to give rise to significant effects requiring an EIA.
LAND USE		
Are there existing land uses or community	Yes The Riverview Park residential estate is	No Considering the beneficial employment and economic output

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (only if Yes in part 2a) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
facilities on or around the location which could be affected by the project? e.g. housing, densely populated areas, industry / commerce, farm/agricultural holdings, forestry, tourism, mining, quarrying, facilities relating to health, education, places of worship, leisure /sports / recreation.		opposite the site. Southern Valley Golf Club to the south of the Site and Gravesend Golf Centre to the north. The existing Cascades leisure centre on the Site will be replaced and enhanced.		that the development will generate during both the construction and operational phases through direct and indirect job creation, the socio-economic impacts of the proposals are not anticipated to be significant or complex giving rise to the need for EIA.
Are there any plans for future land uses on or around the location which could be affected by the project?	No	It is not considered that the proposed development will impact the operation of surrounding developments.	No	N/A
LAND STABILITY AND CLIMATE				
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	Not in a known area of risk.	No	N/A
CUMULATIVE EFFECTS				
Could this project together with existing and/or	No	It is envisaged that all developments being	No	N/A

Question	(Part 2a) / (Part 2b) - Answer to the question and explanation of reasons (Yes/No or Not Known (?) or N/A)		(Part 3a) / (Part 3b) (<u>only if Yes in part 2a</u>) - Is a Significant Effect Likely? (Yes/No or Not Known (?) or N/A)	
approved development result in cumulation of impacts together during the construction/operation phase?		brought forward within the area will be subject to appropriate management plans and embedded mitigation during their construction and operation to ensure that significant environmental effects do not arise.		
TRANSBOUNDARY EFFECTS				
Is the project likely to lead to transboundary effects?	No	No effects are likely.	No	N/A

Planning Submission

Notwithstanding your consideration of the requirement for EIA in connection with the Proposed Development, additional material will accompany the application to assist in your consideration of the proposals. The material will include:

- 1 Application form, Site ownership certificate and CIL form;
- 2 Application drawings – Site Location Plan, Block/Site Plan, Existing and Proposed floor and roof plans, Elevations and Sections;
- 3 Planning Statement;
- 4 Design & Access Statement;
- 5 Air Quality Assessment;
- 6 Ecological Appraisal and Biodiversity Survey;
- 7 Construction and Environmental Management Plan;
- 8 Archaeology (desk-based study);
- 9 Energy & Sustainability Statement;
- 10 Flood Risk Assessment and Drainage Strategy;
- 11 Land Contamination Desktop Assessment;
- 12 Landscape Visual Impact Assessment;

- 13 Lighting Assessment;
- 14 Noise and Vibration Assessment;
- 15 Structural Survey;
- 16 Statement of Community Involvement;
- 17 Transport Assessment and Travel Plan;
- 18 Utilities Strategy;
- 19 Ventilation & Extraction Statement;
- 20 Waste Management Plan; and
- 21 UXO Desktop Survey.

Conclusion

Our analysis above has concluded that there are unlikely to be any significant environmental effects which will give rise to the need for EIA in association with the Proposed Development. This conclusion has been drawn through an analysis of environmental conditions. Developments of a similar scale in the vicinity of the Proposed Development has also not give rise to a need for EIA.

We trust that you have sufficient information to determine whether this is an EIA development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated). From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any feature of the Proposed Development and measure envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact me or my colleague Kelly Phillips if you have any questions.

Yours faithfully



Nuala Wheatley
Senior Planner